

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

**(EIA REFERENCE: 14/12/16/3/3/2/2058)**

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

<b>Name</b>	<b>Organisation</b>
Theo Lexow	Transnet
Batha Msomi/Michelle Lotz	eThekweni Regional Coordinator: Biodiversity Impact Assessment
Simon Forster	Physalia Associates Ltd
DFFE (EIA Applications)	Department of Forestry, Fisheries and Environment (DFFE) (EIA Applications)
Briege Williams	South African Heritage Resources Agency (SAHRA) (Heritage Officer)
DFFE (Oceans and Coasts)	DFFE – Oceans and Coasts
Andrew Blackmore	Conservation Planning – KZN Wildlife (Scientific Manager)
Luigi Barberis	ENI South Africa Managing Director
Alfons van Craeynest	South African Maritime Safety Authority (SAMSA)
Omar Parak	Department of Economic Development, Tourism and Environmental Affairs (EDTEA) Sub - Directorate Coastal and Biodiversity
Retsepile Matabane	Transnet
Jacqueline Letsatsi/ D. Ndlovu	Passenger Rail Agency of South Africa (PRASA)
Sabelo Ngcobo	EDTEA (Department head)

Name of Organisation	Comment	Response
<p>Date: 22.042021 E Mail Theo Lexow Transnet</p>	<p>I received this application from Acer Africa, the land does not belong to Transnet but belongs to PRASA. I did notify ACER AFRICA but the reminder was send to Transnet again.</p> <p>I do know that Transnet and PRASA share the infrastructure and because of that I thought it might be wise to send this to your office to look into the matter.</p>	<p>Thank you. ACER emailed Mr Retsepile Matabane with information on the project and a map of the proposed cable route, and requested a contact person for PRASA to comment. An email was sent on 26 April 2021 and followed up on 29 June 2021.</p>
<p>Date: 26 04 2021</p> <p>Email to Batha Msomi</p> <p>eThekwini Regional Coordinator: Biodiversity Impact Assessment</p>		<p>Email from ACER sent 26 04 2021</p> <p>Dear Batha, Please could you kindly send us the contact person and email address for eThekwini Water and Sanitation (EWS – Water Planning). The Department of Human Settlements, Water and Sanitation requests a signed Service Level Agreement indicating the availability of services and we need to send this request through.</p> <p>Thank you so much.</p>
<p>Date: 26 04 2021</p> <p>Email to Batha Msomi/Michelle Lotz</p> <p>eThekwini Regional Coordinator: Biodiversity Impact Assessment</p>		<p>Email from ACER sent 11 06 2021</p> <p>Dear Michelle/Batha</p> <p>Mr Omar Parak of DEDEAT requested that we have Dr Mather on the mailing lists as eThekwini needs to be aware of the intention to apply for Sea Shore Lease Permits along with the applications for environmental authorisations, and in commenting on the EIA processes should acknowledge this.</p> <p>I know that you have requested we do not add other eThekwini officials to our EIA databases, as your department acts as the co-ordinator for co-ordinated comments.</p> <p>Please may I ask then that for the marine fibre optic cable installations at Amanzimtoti (2AFRICA AND T3 MAURITIUS TELECOM), that the request you send out for co-ordinated comment includes Dr Mather?</p>

		<p>Also, we still do not seem to be receiving comment from parks and recreation, which is odd considering it is their property, although perhaps in the next round we will.</p>
<p>Date: 30.04.2021 :E Mail Dr Simon Forster Physalia Associates Ltd - Director / Senior Consultant</p>	<p>Thank you for your call yesterday and your subsequent email. I see the proposed cable route does go right through the middle of our survey grid. Before I comment 'on the record', I will need to chat with the Acacia/AECI about this. I have on-line meetings scheduled with them next week so I will be able to get back to you after that. I hope that is OK with you.</p>	<p>ACER contacted Dr Simon Forster and provided him with a diagram which shows the proposed 2AFRICA cable landing at Amanzimtoti, in relation to the APS sampling sites provided by AECI; AECI's comments sent in response to the Draft Scoping Report (DSR) and the website link to the DSR. ACER requested Dr Forster's comment on the potential impacts of the cable on the sampling sites and procedures next to the marine outfall pipelines.</p> <p>ACER thanked Dr Forster for his initial input and looks forward to official comment, which can be taken forward as part of the next phase of the environmental assessment process, i.e. the Impact Assessment, which follows on from Scoping.</p>
<p>Date: 30.04.2021 Email DFFE – EIA Applications</p>	<p><b>ACCEPTANCE OF THE SCOPING REPORT FOR THE PROPOSED MARINE TELECOMMUNICATIONS SYSTEM (2AFRICA/GERA (EAST) CABLE SYSTEM) TO BE LANDED AT AMANZIMTOTI ON THE EAST COAST OF SOUTH AFRICA, KWAZULU-NATAL PROVINCE.</b></p> <p>The final Scoping Report (SR) and the Plan of Study for Environmental Impact Assessment dated May 2021 and received by the Department on 30 April 2021, refer</p> <p>The Department has evaluated the submitted final SR and the Plan of Study for Environmental Impact Assessment dated May 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>	<p>Thank you for the acknowledgement of receipt of the FSR and Plan of Study for the 2AFRICA/GERA (East) Marine Cable System to be landed at Amanzimtoti (EIA Reference Number 14/12/16/3/3/2/2058).</p>
	<p><b>Public Participation</b></p>	

	<ul style="list-style-type: none"> <li>• Please ensure that comments from all relevant stakeholders are submitted to the Department with the EIAr. This includes but is not limited to the KwaZulu-Natal Department of Economic Development, Tourism and Environmental Affairs (DEDTEA); KwaZulu-Natal DEDTEA: Coastal and Biodiversity Management; KwaZulu-Natal Department of Agriculture and Rural Development: Agricultural Resources Management; Department of Forestry, Fisheries and the Environment (DFFE): Oceans and Coasts; DFFE: Biodiversity and Conservation; DFFE: Forestry Regulations and Support; DFFE: Sustainable Aquaculture Management; DFFE: Marine Resource Management; Department of Water and Sanitation: Institutional Management; eThekweni Metropolitan Municipality; Ezemvelo KZN Wildlife; KwaZulu-Natal Amafa and Research Institute; South African Heritage Resources Agency (SAHRA); Transnet; South African Navy Hydrographic Office; and the South African Maritime Safety Authority.</li> <li>• 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 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 comments, proof should be submitted to the Department of the attempts that were made to obtain comments.</li> <li>• A Comments and Response trail report (C&amp;R) must be submitted with the final EIAr. The C&amp;R report must incorporate all comments 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. Please note that a response such as "noted" is not regarded as an adequate response to I&amp;APs comments.</li> <li>• Comments from I&amp;APs must not be split and arranged into categories. Comments from each submission must be responded to individually.</li> <li>• 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).</li> </ul>	<p>All comments received have been captured in the Comments and Response Reports submitted with the DEIAR, along with the original comments received from I&amp;APs and Authorities (refer to DEIAR Appendix D and Appendix E).</p> <p>Proof of correspondence with authorities is included in Appendix D. Responses to comments are included in the CRRs contained in Appendix C, as well as further addressed in the DEIAR, where relevant.</p> <p>The CRRs containing all comments and responses since project announcement, are contained in Appendix E of the DEIAR.</p> <p>Each individual comment is responded to, in the CRRs.</p> <p>The Public Participation Process has been, and will continue to be undertaken, in compliance with this legislation. Refer to Chapter 8 of the DEIAR.</p>
	<p><b>Alternatives</b></p>	

	<ul style="list-style-type: none"> <li>• Please provide a description of each of the preferred alternative types and provide detailed motivation on why it is preferred.</li> </ul>	<p>Refer to Chapter 5 of the DEIAR for a description of alternatives.</p>
	<p><b>Layout &amp; Sensitivity Maps</b></p> <p>The EIAR must provide the following:</p> <ul style="list-style-type: none"> <li>• Clear indication of the envisioned area for the proposed marine telecommunication cable system i.e. placing of the optic fibre cable and all associated infrastructure re should be mapped at an appropriate scale.</li> <li>• Clear description of all associated infrastructure. This description must include, but is not limited to the following: <ul style="list-style-type: none"> <li>○ Beach manhole;</li> <li>○ Cable landing station; and;</li> <li>○ All other supporting onsite infrastructure</li> </ul> </li> </ul> <p>The EIAR must include a copy of the final preferred route layout map. All available biodiversity information must be used in the finalisation of the layout map. Existing infrastructure must be used as far as possible. The layout map must indicate the following:</p> <ul style="list-style-type: none"> <li>• Wetlands, drainage lines, rivers, stream and water crossing (if any) of the cable indicating the type of bridging structures that will be used;</li> <li>• The location of sensitive environmental features on site e.g. CBAs, heritage sites, wetlands, drainage lines etc. that will be affected by the cable and its associated infrastructure;</li> <li>• Location of access and service roads (if any);</li> <li>• All existing infrastructure on the site, such as pipelines and roads;</li> <li>• Buffer areas; and</li> <li>• All "no-go" areas.</li> </ul> <p>The final layout map must be superimposed (overlain) on an environmental sensitivity map, indicating any environmental sensitive areas and features identified during the assessment process.</p> <p>The EIAR must also provide the bend point coordinates for the proposed marine telecommunication cable system (i.e. for the linear activities), as well as the coordinates for the associated infrastructure.</p>	<p>Numerous maps and figures in the DEIAR indicate the locality and position of the project infrastructure at sea and on land. In addition, refer to Appendix G (Supporting Maps).</p> <p>The maps referred to above, contain the information listed. There is too much information to be contained on a single map.</p> <p>The maps referred to above show environmental sensitivities overlaid by the proposed marine and terrestrial components of the 2AFRICA/GERA (East) Submarine Cable System (Amanzimtoti landing).</p> <p>GPS co-ordinates for the start, mid and end points of the linear infrastructure are provided on geo-referenced maps as well as the co-</p>

		<p>ordinates for associated infrastructure. Cable coordinates are also provided in Appendix C of the DEIAR.</p>
	<p><b>Specialist assessments</b></p> <p>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 authorisations.</li> <li>• Provide 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 development of associated infrastructure including access roads is allowed in the 'no-go' areas.</li> <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> <li>• Regarding cumulative impacts: <ul style="list-style-type: none"> <li>○ Clearly defined cumulative impacts and where possible the size of the identified impact must be quantified and indicated.</li> <li>○ A detailed process flow to indicate how the specialist's recommendations, mitigation measures and conclusions from the various similar developments</li> </ul> </li> </ul>	<p>Draft terms of reference were provided in the FSR and the accepted Plan of Study for Scoping. The specialist studies will conform with the items mentioned. Please refer to Section 7.3 and Section 9 of the DEIAR as well as Appendix B of the DEIAR.</p> <p>The methodology for each specialist assessment is included in the specialist reports provided in Appendix B of the DEIAR. The footprints of all infrastructure were also provided to the specialists and can be seen in the maps included in Appendix G 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 department's definition of a No-Go area and this is stated as much in the EMPr.</p> <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 DEIAR and the EMPr compiled for this development</p> <p>Cumulative impacts are assessed in the DEIAR. Refer to Section 10.7. However, the impacts of the proposed 2AFRICA/GERA (East) Submarine Cable System (Amanzimtoti landing) on the marine and terrestrial environments is considered to be low, and will not contribute substantially</p>

	<p>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.</p> <ul style="list-style-type: none"> <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> <li>○ A cumulative impact environmental statement on whether the proposed development must proceed.</li> </ul> <p>Should the appointed specialists specify contradicting recommendations, the EAP must clearly indicate the most reasonable recommendation and substantiate this with defensible reasons; and where necessary, include further expert advice.</p>	<p>to impacts from other cables landing at Amanzimtoti (currently one other cable lands at Amanzimtoti).</p> <p>Noted. It is the responsibility of the EAP to make the final judgement call on applicable mitigation measures.</p>
	<p><b>Environmental Management Programme CEMPr</b></p> <ul style="list-style-type: none"> <li>• A construction and post construction monitoring phase EMPr that includes mitigation and monitoring measures must be submitted with the final EIAR.</li> <li>• Please ensure that the mitigation measures specified in the EIAR and specialist reports are also incorporated into the 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.</li> <li>• The EMPr must also include the frequency for auditing of compliance with the conditions of the EA and EMPr, and for the submission of such compliance reports to the competent authority.</li> </ul>	<p>The EMPr contained in Appendix F of the EMPr complies with Appendix 4 of the EIA Regulations, 2014 and includes mitigation and monitoring measures specified in the EIAR and specialist reports, including a section on compliance monitoring and auditing.</p> <p>The EMPr stipulates monthly auditing during construction and monitoring of the site for 6 months post construction during the rehabilitation phase. Refer to the EMPr (Section 3.2.4).</p>
	<p><b>Listed Activities</b></p> <p>The EIAR must provide an assessment of the impacts and mitigation measures for each of the listed activities applied for.</p> <ul style="list-style-type: none"> <li>• The listed activities represented in the EIAR and the application form must be the same and correct.</li> <li>• The EIAR must assess the correct sub listed activity for each listed activity applied for.</li> </ul>	<p>Refer to Chapter 10 of the DEIAR. The DEIAR assesses the impacts associated with the triggered listed activities.</p> <p>The listed activities represented in the EIAR and the application form are the same.</p> <p>Noted.</p>
	<p><b>General</b></p>	

	<p>Should a Water Use License be required, proof of application for a license needs to be submitted. Please also ensure that the EIAR complies with Appendix 3 of the EIA Regulations, 2014,</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>The project triggers a General Authorisation as there is a wetland within 500 m of one of the project components. However, this wetland will not be affected by the project and has a risk rating of low. The EAP intends to apply to DHSWS for an exemption from submitting an application and will be discussed with DHSWS during the pre-application meeting to be scheduled for the Water Use License Application.</p> <p>The EAP is aware of the EIA timeframes and will ensure that all legislated timeframes are met during the EIA process.</p> <p>No construction will commence prior to the issuance of the Environmental Authorisation..</p>
<p>Date: 30.04.2021 Email Ms Briega Williams South African Heritage Resources Agency Heritage Officer</p>	<p>I have checked SAHRIS and the document is there so I will review it and issue a comment in due course.</p> <p>The South African Heritage Resources Agency (SAHRA) would like to thank you for submitting the Draft Scoping Report (DSR) for the proposed Marine Telecommunications system (2AFRICA/GERA (East) cable system) to be landed at Amanzimtoti, KZN on the East 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 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 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 Final Scoping Report period documents for the above-mentioned project have been uploaded to SAHRIS for your review and comment. Please advise if you have received the documents.</p> <p>Thank you for your acknowledgement.</p> <p>A Heritage Assessment has been undertaken as part of the Impact Assessment process. Refer to Appendix B of the DEAIR.</p> <p>The EAP is aware of this condition.</p>



	<p>The proposed cable runs to the south of Durban and lands at Amanzimtoti. The nearest recorded wreck is an unknown wreck lying approximately 4.5km SE of the landing site which is marked as a hazard as it is said to contain cylinders of chlorine. There are no recorded historic wrecks in the immediate vicinity of the proposed cable route. However, there are a number of wrecks further out in deeper waters 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 proposed 2AFRICA/GERA (East) Submarine Cable System (Amanzimtoti 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>Date: 03.05.2021 Email Department of Forestry, Fisheries and Environment – Oceans and Coasts</p>		<p>This email serves to inform you that the Final Scoping Report Period documents for the above-mentioned project has been loaded onto your department's link.</p>
<p>Date: 03.05.2021 Email Dr Andrew Blackmore Scientific Manager Conservation Planning – KZN Wildlife</p>	<p>Please will you correct Acer's database to reflect Nerissa (copied in) as Ezemvelo KZN Wildlife's initial point of contact for all EIA matters – including notifications such as this.</p>	<p>Thank you. The database has been adjusted accordingly.</p>
<p>Date: 03.05.2021 Email Luigi Barberis ENI South Africa Managing Director</p>	<p>As per the previous communications here attached, we have recently received from Mr. James Malone the notification for entering our ER236 Block. As stated by our Exploration Manager, before communicating that there are no objections from our side (and Sasol too being our Partner), we kindly ask you to provide us with the shape files of the final proposed cable route. After receiving the requested data and performing the verification, we will communicate our position.</p>	<p>ACER passed on ENI's communication to ASN. A series of email communications ensued between ENI and ASN, resulting in the issuance of a letter of no objection to ASN, for the proposed cable route of the 2AFRICA/GERA (East) Submarine Cable System (Amanzimtoti landing).</p>
<p>Date : 12.05.2021 Email Dr Simon Forster Physalia Associates Ltd -</p>	<p>Further to our previous discussions, please find at letter outlining my thoughts on the proposed 2Africa telecommunications cable.</p> <p>Having seen the actual proposed route, I have concerns that the trenching process will disturb, disseminate and redistribute historically contaminated sediments that are associated with the titanium dioxide production process effluent that had been</p>	<p>Thank you for Physalia's letter raising concerns about the burial of the pipeline along the proposed route, potentially disturbing historically contaminated material.</p> <p>In response to Dr Forster's communication, the project team entered into further correspondence and subsequently held a meeting with Dr Forster</p>

<p>Director / Senior Consultant</p>	<p>discharged at the site for an extended period until 2016. This area is located immediately to the north east of the pipelines and extends to, and includes our site 19 which is beyond the Metiss cable that was installed late last year. Disturbing these sediments will have unpredictable and quite possibly detrimental consequences for the marine life of the Amanzimtoti coastal water. Consequently, I have recommended that the new cable is not located between the pipelines and the Metiss cable route.</p> <p>If you would like to discuss further, please contact me using the detail in the email footer.</p> <p>Thank you for the information you forwarded by email following our telephone conversation last week regarding the proposed 2Africa cable route and landing site at Amanzimtoti.</p> <p>My initial thoughts during our conversation were that the trenching and installation of the cable would not affect our ability to detect and delineate any ecological impacts of the discharged waste water from the two pipelines. As discussed, the techniques we employ (macro- and meiofauna community analyses in conjunction with particle size and chemistry assessments) enable us to distinguish between physical disturbance, as would occur during the trenching process, and contamination-induced impacts. However, having seen the documents you forwarded; I do now have concerns regarding the proposed cable route.</p> <p>Our surveys have demonstrated the existence of an area of historically contaminated sediment immediately to the north east of the pipelines. This relates to the titanium dioxide production process that was in operation at the UIC site until 2016. The area extends from the pipelines to the north east, up to and including Site 19. It is characterised by elevated concentrations of heavy metals. Under existing conditions, the contaminated sediments do not exert a detectable ecological impact on the benthic (seabed) fauna and the contamination of the surface layers, whilst persistent, does not appear to be bioavailable.</p> <p>For many decades, the titanium dioxide process effluent was discharged into the coastal waters and we (Physalia Associates) have no information as to the depth of the contamination or the sediment conditions below the surface layers. With depth, the aerobic conditions and the pH of the sediment will change and there is a likelihood that the buried contamination will not be bound within the sediment and will be bioavailable. The trenching process would cause considerable disturbance to the seabed and cause the dissemination of the contaminated material into the water column and the</p>	<p>on (21 June 2021) to discuss how best to mitigate the risks associated with disturbance of historically contaminated sediments along the proposed cable route. The alternatives discussed are described in Section 5.6 of the DEIAR and the potential risks have been assessed in the marine specialist reports and in the DEIAR (Chapter 10).</p> <p>To achieve cable burial this is typically achieved with the use of a specially designed plough, which is submerged onto the seabed by the cable laying ship. The cable will be fed from the ship to the plough which then feeds the cable into the trench created by the plough shear. Effectively the ploughing involves the plough shear cutting through the sediment to a depth of 2 m through which the cable is fed (plough shear has a width of 20 cm) by pushing the sediment apart. Once the plough shear moves on, the sediment is simply allowed to close on itself again burying the cable.</p> <p>Please see the following link to see an example of how ploughing takes place:</p> <p><a href="https://www.youtube.com/watch?v=SXRG5rpYUP4">https://www.youtube.com/watch?v=SXRG5rpYUP4</a></p> <p>Although water jetting is sometimes used to lubricate the plough shear to make ploughing easier the plough can also be operated 100% mechanically. If this takes place, there is limited disturbance to the sediment and little or no plumes are created due to slow towing speed (it will be like dragging an anchor over the seabed at a speed of 600 m/h = 10 m/min or 0.16 m/s). The only visible disturbance to the seabed will be limited to the tracks made by the plough skids and the plough scar which falls back on itself once the plough moves on.</p> <p>In addition to the above, ACER would like to point out that the contaminated area pointed out by APS is only 619 m in extent which would mean that the ploughing operation could be completed within a period of 1.5 hours</p> <p><u>Alternatives considered to reduce potential impacts on the receiving environment:</u></p> <p>Following the meeting held between APS, ASN, WIOCC, ACER and Physalia the ASN cable engineers relooked at the proposed ploughing options and proposed the following alternatives for cable installation over the area of contamination:</p>
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redistribution of these materials throughout the Amanzimtoti marine habitat. This may well cause deleterious effects (impacts) on the marine faunal and floral communities.

I understand that the Metiss cable was installed recently. This crossed the north eastern edge of the area of historic contamination. I would recommend strongly that the route of the 2Africa cable is not located to the south west of the Metiss cable. Given the uncertainty of the nature and magnitude of the historic contamination at the site, the effects of disturbing the sediment are unpredictable and the resulting impacts on the marine communities uncertain. Consequently, the area between the existing pipelines and the Metiss cable should remain undisturbed.

Thank you again for the opportunity to comment on the cable route. If you would like to discuss this further, please contact me using the details provided above

Preferred Alternative:  
Undertake cable burial as planned to a depth of 2 m but only using mechanical ploughing. This means that the water jet system which is used to lubricate the plough shear would not be turned on thus limiting the potential for contaminated sediment to become suspended in the water column.

Alternative 2:  
Undertake cable burial to a depth of 0.5 m using only mechanical ploughing. This alternative would reduce the depth to which ploughing takes place thus satisfying Physalia's concerns that the chemical properties of deeper sediments are unknown. A burial depth of 0.5 m would also ensure that the cable cannot be snagged by the grab bucket when annual sampling of the sediments takes place.

Date: 31.05.2021  
E mail:  
Mr Alfons van Craeynest  
SAMSA

We spoke on Friday regarding the proposed marine telecommunications cables currently undergoing an environmental authorisation process.

As I mentioned, the South African Navy Hydrographic Office is responsible for safety of navigation during such operations. We would need to communicate with the operator who is installing the cable for the Superintendent of Safety Information, Cdr Theunissen, to promulgate Coastal Navigational Warnings during the installation.

I have been provided with shape file data by the United Kingdom Hydrographic Office (UKHO) for the 2 AFRICA WEST cable which is planned for 2022/2023. I have attached a document and related graphic showing the plotted cable positions.

The other cable is the 2 AFRICA/GERA (East) cable system and I have also attached a document relating to this cable.

There is slight confusion, as the UKHO have published a preliminary Notice to Mariners stating that cable installation works are planned between November 2020 and November 2021 for segment Cape Town, Port Elizabeth, Durban and Maputo? I have attached a copy of the P NM for reference.

It would be much appreciated if you would kindly provide comment or clarity regarding the above and attached documents.

In response to the telephonic discussion and emailed query from the SAN Hydrographic Office, ACER sent Mr Van Craeynest's queries on to ASN. ASN subsequently provided Mr Van Craeynest with a proposed schedule of installation of all the 2AFRICA branch cables. ASN stated that they will contact the SAN Hydrographic Office as well Mr James Collicot from SAMSA well in advance of the proposed installation dates.

Project	Site	POW	Start	Finish
2AFRICA GERA	Duynefontein, South Africa	SIMBA GERA Issue AH	16/08/22	29/08/22
2AFRICA GERA	Port Elizabeth, South Africa	SIMBA GERA Issue AH	12/09/22	25/09/22
2AFRICA GERA	Amanzimtoti, South Africa	SIMBA GERA Issue AH	03/10/22	16/10/22
2AFRICA WEST	Yzerfontein, South Africa	SIMBA WEST POW Issue 1.1	19/04/23	02/05/23



	<p>authorisation – and if there is indeed a variation between the preferred route and the route authorised, a further revised layout will need to be submitted to EDTEA.</p> <p>3. In relation to (2) above, the full extent cable footprints for METISS (existing cable) and 2AFRICA/GERA should be overlaid. The applicant (WIOCC) is further reminded that a third cable is proposed for the same beach (Pipeline Beach, i.e. T3 cable with the applicant being Liquid Telecom) – due diligence therefore dictates that the respective footprints are all known and do not end up compromising each other’s infrastructure and the related cable buffers.</p> <p>4. Does the EIA application cover construction, operation and maintenance aspects of the cable?</p> <p>5. Appendix 2: second figure. What are the “in service pipes” depicted and their purpose?</p>	<p>3. ACER provided a map showing all cable alignments. Where existing cables are crossed, the industry norm is to ensure that the crossing is undertaken using a similar type of cable, i.e. an armoured cable crosses an armoured cable or an un-armoured cable crosses an un-armoured cable. Where seabed conditions allow, post lay cable burial using a Remote Operated Vehicle (ROV) can be performed to afford additional protection to the cables at the crossing point. The landing partner is part of International Cable Protection Committee (ICPC) and, as such, there are a number of guidelines in place to ensure that new cable systems do not negatively impact on existing marine telecommunications systems. Therefore, WIOCC must abide by the conditions stipulated by the ICPC to ensure no negative impacts are experienced by existing marine cable operators such as Liquid Telecom.</p> <p>4. Yes, the EIA covers construction, operation and maintenance of the cable system. It should be noted however that if installed correctly, no operational or maintenance activities should be required for the life of the cable (+- 25 years).</p> <p>5. The in service pipeline refers to the AECI Property Services (APS) wastewater pipeline from the Umbogintwini Industrial Complex. Effluent is discharged through the pipeline under a permit issued in terms of Section 69 of the ICMA into the coastal environment via the marine outfall. The effluent pipeline proceeds from the embankment of the area referred to as Kingsway Plot (Kingsway 3) and is buried under Beach Road, the beach carpark and under the beach at Amanzimtoti Pipeline Beach, whereafter it goes out to sea.</p>
<p>Date: 30.06.2021 E mail Omar Parak EDTEA Sub- Directorate</p>	<p>Your feedback refers. As per layout provided, what are the implications, including maintenance, of the T3 and 2AFRICA cables crossing? Do the respective applicants have awareness and concurrence of this situation?</p>	<p>Both cable operators are aware of their requirements in terms of cable crossings, and they have to operate the cables as per the International Cable Protection Committee (ICPC) guidelines. As such, crossings and maintenance of cables is undertaken as per the guidelines which have been set out.</p>

Coastal and Biodiversity		
Date: 09.07.2021 E mail Omar Parak EDTEA Sub-Directorate Coastal and Biodiversity	A reminder that I cannot move with the Gazette Notice until such time the Seashore application is uploaded to your website.	The application is now uploaded on our website. We used the following newspapers when we advertised the 2AFRICA project : The Mercury and South Coast Sun.
Date :21.06.2021 E Mail: Department of Forestry, Fisheries & Environment Ocean & Coasts	<p>I trust this email finds you well. Please find the attached comments on the Final Scoping Report on the Proposed Marine Telecommunications System (2Africa/Gera (East) Cable System) to be landed at Amanzimtoti, Kwazulu-Natal on the East Coast of South Africa for your perusal and implementation.</p> <p>Kindly note that all future correspondence and documentation, enquiries, meetings and site inspection requests or information relating to EIA applications (hard copy and an electronic copy) should be submitted to our office or via <a href="mailto:OCeia@environment.gov.za">OCeia@environment.gov.za</a> / or Physical Address: Department of Forestry, 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>SUBJECT: COMMENTS ON THE FINAL SCOPING REPORT FOR THE PROPOSED MARINE TELECOMMUNICATIONS SYSTEM (2AFRICA/GERA (EAST) CABLE SYSTEM) TO BE LANDED AT AMANZIMTOTI, KWAZULU-NATAL ON THE EAST COAST OF 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 give to review and provide comments on the Final Scoping Report on the Proposed Marine Telecommunications System (2Africa/Gera (East) Cable System) to be landed at Amanzimtoti, Kwazulu-Natal on the East Coast of 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>	Thank you for your email and comments received.

	<p>The Branch O&amp;C has the mandate to ensure the holistic management of the coast and estuarine areas as an integrated system and promote coordinated coastal management. It provides protection of the ecological integrity, natural character, and the economic, social, and aesthetic value of the coastal zone, as well as ensures the protection of people, properties, and economic activities from coastal risks arising from dynamic coastal processes. It promotes social equity and strives to make the best economic use of coastal resources.</p> <p>The comments and recommendations as provided below are designed to ensure the achievement of the aims and objectives of the ICM Act and that the coastal environment will be protected and conserved throughout all proposed development phases</p>	
	<p>1. Under Section 7A of the ICMA, coastal public property is established to improve access to the seashore; protect sensitive coastal ecosystems, and protect people, property, and economic activities from risks arising from dynamic coastal processes. Section 12 further prescribes that the State, in its capacity as the public trustee of all coastal public property must take whatever reasonable legislative and other measures it considers necessary to conserve and protect coastal public property for the benefit of present and future generations. The coast must be developed in a manner that allows for safe access and enjoyment by all people. Coastal development must be designed to build resilience to the impacts of climate change and sea-level rise.</p>	<p>1. The EIA process undertaken by ACER for this development recognises and is in alignment with the objectives of the ICMA, with sustainable development being a guiding principle.</p>
	<p>2. The EAP should note that comments previously submitted by this Branch remain applicable and should be considered throughout all phases of the development.</p>	<p>2. Previous comments are noted and responses thereto were provided in the CRR circulated with the Draft Scoping Report.</p>
	<p>3. National Environmental Management: Integrated Coastal Management Act, 2008 (Act No. 24 of 2008) ("ICM Act") Sections to be adhered to and implemented by the applicant and Competent Authority (CA):</p> <p>3.1 <u>Section 7 of the ICM Act: Composition of Coastal Public Property (CPP)</u></p> <p>3.1.1 In terms of Section 7 of the ICM Act, the applicant should only be permitted to undertake construction and maintenance activities specified in the approved Environmental Management Plan. The applicant should have acquired the Seashore Lease Permit from the DEDTEA for installation of the cable within South Africa's Territorial Waters prior to commencement with construction activities. The competent authority is advised to include this as a condition for approval to ensure that this condition is adhered to.</p>	<p>3.1.1 Construction and maintenance activities are specified in the DEIAR and this is what will be authorised by the DFFE and implemented by the Applicant (WIOCC). On behalf of WIOCC, ACER has submitted an application for a Seashore Lease Permit to DEDTEA, for the proposed development.</p>

	<p>3.1.2 The competent authority is advised to include a condition in the Environmental Authorization which specifies that the applicant will be responsible for the project and compliance with relevant legislation.</p>	<p>3.1.2 The Applicant will comply with the EA and relevant legislation.</p>
	<p><u>3.2. Section 13 of the ICM Act: Access to coastal public property</u></p> <p>3.2.1 Amanzimtoti is a popular tourist destination, with the beaches (Sapphire Coast) being a major drawcard for bathing, surfing, shore-angling, etc. and are also lined with recreational and residential facilities. The report identifies that the proposed landing site alternatives are situated at public beaches which are well used and busy especially during peak season (November to April). For this reason coastal access to the general public should not be restricted nor prohibited at any stage of this development as a result of the implementation of the proposed Marine Telecommunications Cable System to be landed at Amanzimtoti.</p> <p>3.2.2 The report specifies that the installation of the submarine cable in the nearshore environment is estimated to take two weeks to complete (landing and anchoring of the submarine cable). Taking this into account, an exclusion which permits temporary probation can be supported for the duration that the cable will be landed on condition that; (a) the general public is made aware of the proposed works/construction schedule; (b) appropriate notice is provided to ensure that the public tries to plan their recreational activities around the specified schedule for proposed works and that appropriate signage/notices are erected to ensure that the public is aware of which areas to keep out of and during which periods.</p> <p>3.2.3 Furthermore, the beach infrastructure including, paved carparks, signage, braai facilities, showers and toilets and lifesaver's hut/platform, shark nets in place which could be potentially impacted during cable installation need to be protected or replaced at the cost of the applicant should they get damaged as a result of the implementation of the proposed project activities or negligence by the applicant.</p>	<p>3.2.1 Coastal access to the general public will not be restricted nor prohibited as a result of the implementation of the proposed development. During construction, a limited area of the beach and carpark will be cordoned off to the public but access to the surrounding carpark and beaches will not be restricted. After installation, the only visible infrastructure will be the top of the BMH, which will not pose any access restrictions. It must be noted however that during cable installation shark nets will be removed to facilitate cable landing. Notices will be erected notifying bathers of this.</p> <p>3.2.2 Signage will be posted prior to the cable landing, notifying the public of proposed activities and timeframes. However, as mentioned above, access to the beach either side of the cable landing will not be restricted.</p> <p>3.2.3 The Amanzimtoti Beach Office and the Sharks Board will be notified in advance of the cable landing so that shark nets and any other beach infrastructure can be removed or appropriately protected during the cable landing. The applicant will reinstate the beach infrastructure once construction is complete at their cost.</p>
	<p><u>3.3. Section 63 of the ICM Act: Environmental authorisations for coastal activities</u></p>	



<p>3.3.1. The report specifies that the laying of the submarine cable in deep marine waters, including the ploughing and burial of the cable in shallower waters, could potentially result in the disturbance and/or degradation of sensitive marine environments off the KwaZulu-Natal Coast. Further to this is the potential impact that the proposed submarine could have on and commercial and recreational fisheries during its installation and operation.</p> <p>3.3.2. Considering what the CA must consider 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>3.3.3. 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 Coastal Public Property (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.</p> <p>3.3.4. In its comments dated the 12 April 2021, this Branch requested that the CA confirm if the proposed area does not fall 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. Page 69 on Figure 12 confirms that the cable crossing the dunes and the BMH site will overlap with a CBA: Irreplaceable area. It is essential for meeting biodiversity targets directly as they play an important role in supporting and sustaining the ecological functioning of the CBAs. Dune vegetation should as far as possible be avoided to minimize damage to vegetation of the foredunes and further erosion.</p>	<p>3.3.1 Correct.</p> <p>3.3.2 These comments addressed to the CA are noted. Mitigation measures to avoid, manage, minimize and mitigate potential adverse impacts are provided in the DEIAR and included in the EMPr contained in Appendix F of the DEIAR.</p> <p>3.3.3 These items were considered and assessed in the DEIAR, with appropriate mitigations recommended (where mitigation is possible). Refer in particular to Chapter 4 (project description); Chapter 6 (Description of the receiving environment); Chapter 9 (specialist findings); Chapter 10 (assessment of impacts). Note that the potential negative impacts of the proposed 2AFRICA/GERA (East) Submarine Cable System (Amanzimtoti landing) are all assessed as LOW significance, after mitigation.</p> <p>3.3.4 Damage to dune vegetation which is situated in a CBA will be avoided through the use of Horizontal Directional Drilling (HDD) which routes the cable under the dune without disturbing the surface of the dune.</p>
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<p>3.4. Off-Road Vehicle (ORV)</p> <p>The implementation of the proposed Marine Telecommunications Cable System) to be landed at Amanzimtoti 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. 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>4. <u>Recommendations and condition for the attention of the EAP and CA to be included in the final MMP:</u></p> <p>4.1. Following the assessment and review of the alternatives assessed, the Branch Concludes that it in support of Alternative 1 BMH Site Alternative 1 (30° 02.415'S; 30° 53.931'E) as the site houses the existing Liquid Telecom BMH METISS cable at Amanzimtoti Pipeline Beach and would allow for the use of existing land-based infrastructure (BMH, ducting and CLS) and thus minimize impacts on the terrestrial environment. The implementation of this alternative would mean no new construction or unnecessary disturbance to vegetation and surrounding infrastructure would be necessary and thus, potential impacts identified would be negligible. This Branch would strongly advise for the applicant to further explore how they could share the infrastructure with Liquid Telecom.</p> <p>4.2. With the implementation of the Preferred Alternative 3 (BMH Site Alternative3 (Preferred option) (30° 2.409'S 30° 53.933'E), this Branch further notes that cumulative impacts of the subsea cable on marine ecology, socioeconomic impacts and economic impacts on commercial fishing. However, the report concludes that the cable landing and installation is not anticipated to have significant negative impact on terrestrial ecosystems, because the area is built up and infrastructure will be placed in transformed areas. This should be investigated by a specialist ecologist during the Impact Assessment who will advise on the long-term, unintended and cumulative impact of the development proposal.</p>	<p>4.1 This was the original preferred alternative. However, due to contractual issues, the use of this BMH site is not possible.</p> <p>4.2 Potential impacts of the project on terrestrial ecosystems have been investigated by a specialist (refer to Appendix B and Section 9.1 of the DEIAR). The specialist concludes that the proposed BMH Alternative 3 and the preferred fronthaul alignment should proceed, provided that the mitigation measures and recommendations are strictly implemented and subsequently monitored. It will be vital for the High sensitivity Coastal Thicket HU to be avoided as far as reasonably possible. HDD is the recommended means of connecting the marine cable to the terrestrial BMH, primarily due to the cumulative impacts recorded within the study area and the sensitivity of the Seashore HU, as well as it being situated within DMOSS and CBA: Irreplaceable conservation planning units.</p>

<p>4.3. Page 60 of the provides an overview of the three alternative Marine alignments initially considered by the route engineers. The report goes on to conclude that “Marine Route Alternative 3 will be taken forward for assessment in the Impact Assessment”, however, does not provide sufficient reasons to elucidate why Route 1 was not selected.</p> <p>4.4. The report specifies that “No significant impacts on terrestrial fauna are anticipated as the infrastructure will be placed in transformed areas and will be largely underground. This Branch requires this assessment to be confirmed by a specialist ecologist to ensure that all impacts are identified, and that appropriate mitigation measure are implemented.</p> <p>4.5. There is concern that the proposed Site Alternative falls within the same area in which rehabilitation measures are proposed by the by eThekweni Municipality. The impact assessment should assess the potential impacts associated with the development proposal on the stability of the foredune and long-term cumulative and unintended impacts of situating this cable on an environment that is already compromised.</p> <p>4.6. The applicant must consider, adhere to and implement the relevant section of the National “ICM Act” applicable to this project.</p> <p>4.7. Only work necessary must be undertaken and no camping site should be planned and established within the CPP.</p> <p>4.8. 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>4.9. 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>4.3 As outlined in the DSR and FSR Route 1 was not selected due to concentrations of shipping and fishing activity as well as risks associated with not achieving sufficient cable burial. This risk was validated when the METISS cable system was recently damaged by trawling activities which follows a similar cable alignment.</p> <p>4.4 The proposed infrastructure will not impact significantly on faunal habitat as it is confined to transformed areas and the road reserves. Refer to the specialist ecologist report contained in Appendix B of the DEIAR.</p> <p>4.5 Impacts on the dune vegetation will be avoided through the use of HDD. Note that the specialist report on beach and dunes concludes that “<i>The landing of a submarine telecommunications cable and the establishment of related anchor mechanisms along the shoreline and beach-dune interface at Pipeline Beach will, if implemented with the conditions and recommendations presented in this report, give rise to negligible ecological repercussions in the subject area.</i>”</p> <p>4.6 The Applicant will comply with relevant sections of the ICMA.</p> <p>4.7 There will be no overnight accommodation of people at the construction site. Materials may, however, be temporarily stockpiled at the beach carpark subject to permission from eThekweni. No materials will be stockpiled on the beach. Only necessary work will be undertaken in the CPP.</p> <p>4.8 Vegetation clearance will be kept to a minimum.</p> <p>4.9 There are many factors influencing the scheduling of the project. While efforts will be made to avoid the peak season, there may be conflicting priorities such as avoidance of the sardine run which is in winter, and</p>
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	<p>4.10. 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>4.11. 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>4.12. 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 and the sea are likely to require maintenance from time to time. 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 the maintenance of the proposed Marine Telecommunications Cable System) to be landed at Amanzimtoti 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. The plan should pay special attention to the lifespan of the proposed cable and ensuring that the material of the cable is of the best quality and will be of long term.</p> <p>4.13. 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. The options presented should consider the receiving environment, potential impacts and threat to sustainability of the marine environment and function of natural ecosystems.</p> <p>4.14. 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. 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. The Local Municipality should also</p>	<p>timing of the cable laying ship. The duration of the cable laying is only a few days and thus associated impacts will be of short duration.</p> <p>4.10 There are many factors influencing the scheduling of the project. The rainy season will be considered but there may be conflicting priorities such as avoidance of the sardine run which is in winter.</p> <p>4.11 Infrastructure on land is situated as far as possible, in previously disturbed areas. The alignment of the marine cable has taken into consideration avoidance of sensitive areas, as far as possible.</p> <p>4.12 The Beach Manhole is designed to withstand coastal conditions and will require little to no maintenance. The marine cable is provided with cable protection (armour) in areas where abrasion may occur. Cable maintenance will only be required in the case of a break or damage. No routine maintenance is required. 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>4.13 These aspects are documented in the DEIAR. Refer to Chapters 3, 4, 5, and 10 as well as Appendix B.</p> <p>4.14 Specifications relating to the prevention of pollution and contamination as a result of fuels and oils are provided in the EMP. It is in the interests of the Applicant to complete the works in the shortest possible time and to maintain the infrastructure (noting that once installed, no routine maintenance is actually required- maintenance is only required in the case of breakage or damage which is highly unlikely).</p>
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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;

4.15. As far as the Deep-water benthic assessment is concerned, we support the idea of specialist advising whether “existing literature need to be supplemented by site investigations “Section 11.2.4: Page 105. Also, a Criteria to deciding whether this is necessary or not should be clearly unpacked and scientifically supported as highlighted in page 105.

4.16. We have noted the separation of deep-water and shallow water studies. We further request that a subsequent integrated assessment (considering both ecosystems) must be undertaken as activities in one system will impact another (and vice versa) with additional attention on considering life histories and population structure of sensitive taxa (e.g. deep-water corals). Also, characterizing the soundscapes of area will also be beneficial despite in order to advice suitable time slot for operations.

4.17. Erosion control measures must be put in place to minimize erosion along the proposed activity area. Extra precautions must be taken in areas where the soils are deemed highly erodible.

4.18. Soil erosion onsite must be always prevented i.e., pre, during-and post-trenching activities. Erosion control measures must be implemented in areas sensitive to erosion such as near water supply points, edges of slopes, etc. These measures could include the use of sandbags, retention or replacement of vegetation.

4.19. All waste and rubble generated during and/or after construction to be disposed of at an approved landfill site (records to be kept thereof)

4.20. Water and ablution facilities for staff at the construction site to be available from the beginning to the end of construction. Effluent to be disposed of at an approved site (records to be kept).

4.15 The deep-water benthic specialist adopted a ‘desktop’ approach. The landing site at Amanzimtoti is characterized by a stretch of intermediate sandy beach, no different from other similar beaches in the Natal Delagoa Bioregion, and which have been adequately described in the scientific literature. A detailed site investigation was thus not deemed necessary. However, site investigations were undertaken by the shallow benthic specialist, to ensure potential impacts to nearshore reefs are identified and mitigated.

4.16 The DEIAR provides an integrated assessment of all impacts of the project on the receiving environment. Specialist studies assess the significance of impacts of the project, after mitigation, to be LOW on both deep and shallow water benthic habitats. The noise impact is of very low significance. Refer to the specialist reports in Appendix B, and to the summary of specialist findings (Chapter 9) and the assessment of impacts (Chapter 10).

4.17 Soil protection measures are contained in the EMPr (Appendix F of the DEIAR).

4.18 Soil protection measures are contained in the EMPr, which the Contractor must comply with and which will be monitored by an Environmental Control Officer.

4.19 This is a standard specification in the EMPr

4.20 Serviced chemical toilets will be provided.

4.21. Appointment of a Control Environmental Officer (CEO) who will ensure that identified mitigation measures and recommendations are considered, adhered and implemented. The CEO will also be responsible for undertaking site inspections to ensure compliance with the EA conditions to ensure that the marine ecosystem will be protected and conserved during construction and maintenance phases throughout all phases of this proposed project. Furthermore, the CEO must ensure that employees are aware of the procedure to be followed and ensures that necessary materials and equipment are available. Also, should spills and leaks transpires, this department DEFF: Branch O&C must be part of the relevant authorities to be notified [vpeterson@environment.gov.za](mailto:vpeterson@environment.gov.za);

4.22. You are kindly reminded of your duty of care towards the coastal environment in accordance with section 58 of the ICM Act read together with section 28 of NEMA which states that "Every person who causes, has caused or may cause an adverse effect on the coastal environment must take reasonable measures to prevent such adverse effect from continuing, recurring or occurring or, in so far as such harm to the coastal environment is authorised by law or cannot reasonably be avoided or stopped, to minimise and rectify such adverse effect on the coastal environment" by taking into consideration and implement recommendations provided in this comments document recommending measures to be undertaken to ensure the coastal zone is protected, preserved and managed;

4.23. The CA must state clearly within the condition of the EA that no Organ of State will be held liable for the maintenance and upkeep of this project.

4.24. Kindly note that the activity may not commence before an environmental authorisation being granted by the CA. It is an offence in terms of Section 49A "NEMA" for a person to commence with a listed activity unless the CA has granted an environmental authorisation for the undertaking of the activity. A person convicted of an offence in terms of the above is liable to a fine not exceeding 10 million or to imprisonment for a period not exceeding 10 years, or to both such fine and imprisonment;

4.25. Please be advised that the Sub Directorate: Coastal Development and Protection within the Branch: O&C is responsible for coordinating and facilitating EIA comments and advice for developments within the marine environment. Kindly forward request of EIA Comments to, Email: [OCeja@environment.gov.za](mailto:OCeja@environment.gov.za).

4.21 An ECO (on land) and MMO (Marine Mammal Observer) at sea will be appointed to oversee compliance with the relevant EA conditions and EMPr specifications. DFFE- OC will be notified of any spills on site.


4.22 The Applicant is aware of their Duty of Care and the recommendations made by DEFF:OC will be taken into consideration and incorporated into the Impact Assessment and/or EMPr as relevant.

4.23 Noted, the liability for maintenance and upkeep will be the responsibility of the applicant.

4.24 The Applicant will not commence with the activity before an environmental authorisation is granted by the CA.

4.25 Thank you for the information and the EAP will use these contact details.

	<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 <a href="mailto:OCeja@environment.gov.za">OCeja@environment.gov.za</a> / or Physical Address: 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>ACER looks forward to your comments on the DEIAR.</p> <p>These comments have been submitted to DFFE with the DEIAR. 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. A hard copy and an electronic copy will be made available.</p>
<p>Date : 29.06.2021 E Mail Retsepile Matabane Transnet Freight Rail</p>	<p>Good afternoon Ashleigh. I trust that you are well. Kindly contact Jackie Letsatsi at (email withheld).</p>	<p>(24 April 2021) Mr Lexow from Transnet Property has pointed out that PRASA property will be affected by the proposed telecommunications cable, that will land at Amanzimtoti Pipeline Beach and will run inland to the Cable Landing Station at Umbogintwini (see emails below). The Applicant will have to establish a servitude.</p> <p>We would appreciate PRASA's comment, as part of the Scoping phase for this project (see attached). If you are not the correct contact person please kindly provide us with alternative contact details.</p> <p>(29 June 2021) Good Day Mr Matabane</p> <p>I am following up on the email below as we have not, to my knowledge, received a response from PRASA. Please may someone from PRASA respond regarding potential impact on PRASA property.</p> <p>ACER is conducting an EIA process for the proposed submarine cable landing at Amanzimtoti and would like to know whom to notify in PRASA. I attach a map that shows the proposed route of the land cable to Umbogintwini</p> <p>Please could PRASA kindly acknowledge receipt and use the opportunity to raise any concerns or provide comments, as part of the EIA process.</p>

		<p>For further information on the project kindly refer to ACER's website: <a href="http://www.acer africa.co.za">www.acer africa.co.za</a> under "Current Projects" (2AFRICA/GERA (East) – Amanzimtoti).</p> 
<p>Date : 29.06.2021 E Mail from ACER to PRASA (Jacqueline Letsatsi and Mr D Ndlovu)</p>	<p>No reply received from PRASA to date.</p>	<p>Good Day Jacqueline</p> <p>ACER is conducting an EIA process for the proposed submarine cable landing at Amanzimtoti and would like to know whom to notify in PRASA. I attach a map that shows the proposed route of the land cable to Umbogintwini.</p> <p>Please could PRASA kindly acknowledge receipt and use the opportunity to raise any concerns or provide comments, as part of the EIA process.</p> <p>For further information on the project kindly refer to ACER's website: <a href="http://www.acer africa.co.za">www.acer africa.co.za</a> under "Current Projects" (2AFRICA/GERA (East) – Amanzimtoti).</p>
<p>Date : 29.06.2021 E Mail from ACER</p>	<p>No reply received from PRASA to date.</p>	<p>Good Day Mr Ndlovu</p>



<p>to PRASA (Mr D Ndlovu)</p>		<p>ACER is conducting an EIA process for the proposed submarine cable landing at Amanzimtoti and would like to know whom to notify in PRASA. I attach a map that shows the proposed route of the land cable to Umbogintwini.</p> <p>Please could PRASA kindly acknowledge receipt and use the opportunity to raise any concerns or provide comments, as part of the EIA process.</p> <p>For further information on the project kindly refer to ACER's website: <a href="http://www.acerafrika.co.za">www.acerafrika.co.za</a> under "Current Projects" (2AFRICA/GERA (East) – Amanzimtoti).</p>
<p>Date: 08.07.2021 E Mail : Sabelo Ngcobo Head of Department KZN Department of Economic Development, Tourism and Environmental Affairs</p>	<p>Please be advised if the following:</p> <p>The Draft Environmental Scope report (DSR) for the Scoping &amp; Environmental Impact Assessment (EIA) application that has been lodged with the Department of Forestry Fisheries and Environment (DFFE) received by the KZN Department of Economic Development , Tourism and Environmental Affairs (EDTEA) hereafter referred to as "the Department") on 19<sup>th</sup> March 2021 regarding the above mentioned proposal: The DSR has been reviewed by the Department ,and the Department has the following comments with regards to the proposed development:</p> <ul style="list-style-type: none"> <li>• Page 9 of the SR contains the listed activities that trigger the EIA Regulations of December 2014 as amended: however Activity 26 of GNR 325 of 2017 must be confirmed.</li> <li>• Page 8 of DSR, states that there will be rehabilitation of dune vegetation at Amanzimtoti beach whilst laying of the underground cable. A rehabilitation plan for this purpose must be compiled and included in the EMPr.</li> <li>• All recommendations from specialist's studies must be included in the EMPr.</li> <li>• The subsequent maintenance of the infrastructure (e.g. exposure of the cable on the beach due to erosion) must be clarified and addressed.</li> <li>• The I &amp; APs comment and objections must be adequately addressed prior to submission of the final EIAR to the Department.</li> </ul>	<p>Thank you for the email. Please note that the comment period for the DSR was 19 March 2021 – 22 April 2021.</p> <p>Activity 26 ( inter- and sub-tidal structures for entrapment of sand) will remain as part of the activities for which authorisation is applied, unless the competent authority interprets and advises that it does not apply.</p> <p>Dune vegetation will not be affected because Horizontal Directional Drilling (HDD) will be used to install the cable under the dune. Please refer to Annexure 2 of the EMPr which deals with rehabilitation should it be required.</p> <p>All relevant mitigations from the specialist studies are included in the EMPr (refer to Appendix F of the DEIAR).</p> <p>The cable will be buried to 2m depth below the beach surface and cable exposure is not anticipated, even when the beach is deflated.</p> <p>Please refer to this CRR.</p>

	<ul style="list-style-type: none"> <li>• The actual comments by I &amp;APs including a comments response report with responses to comments.</li> <li>• It is the responsibility of the applicant to determine the necessary requirements of the relevant authorities for permits/licenses required and does not exclude you from compliance with any other relevant and applicable legislation and local bylaws.</li> </ul> <p>Please note that the activities applied for may not commence prior to an Environmental Authorization being granted by the Department of Forestry, Fisheries and Environment, and the seashore lease being granted by the KZN Department of Economic Development Tourism and Environment Affairs..</p>	<p>Please refer to this CRR.</p> <p>The Applicant is aware of their responsibility in this respect.</p> <p>The Applicant will not commence with the activity before an environmental authorisation is granted by the CA.</p>
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<p>28.07.2021 (Email from ACER to DFFE)</p>	<p>EMAIL from ACER to DFFE:</p> <p>Dear Rueben</p> <p>Project Background:</p> <p>ACER (Africa) Environmental Consultants have been appointed by Alcatel Submarine Networks (ASN) to assist with the environmental authorisation process for the proposed 2AFRICA/GERA (East) Cable System to be landed at Amanzimtoti on behalf of the South African landing partner West Indian Ocean Cable Company (WIOCC). The project involves the installation and operation of the 2AFRICA/GERA (East) Cable System, which comprises marine and terrestrial components. The marine component entails from where the submarine cable enters South Africa's Exclusive Economic Zone (EEZ) (within 200 Nm from the seashore), passes through South Africa's Territorial Waters (12 Nm from the seashore), and lands on shore. The terrestrial component involves where the cable traverses the beach to the Beach Manhole (BMH) at Amanzimtoti Pipeline Beach and traverses inland to reach the Cable Landing Station (CLS) at Umbogintwini. In the offshore environment the cable is planned to be buried to a depth of up to 2 m (substrate permitting) to protect the cable and to reduce risks associated with ship anchoring, trawling and ocean currents.</p> <p>A section of the offshore alignment of the 2AFRICA/GERA (East) Cable System is routed close to a marine outfall pipeline operated by AECI Property Services (APS). The marine outfall pipeline (known as the Huntsman Pipeline) receives wastewater from various points of generation within the Umbogintwini Industrial Complex and discharges the wastewater into the marine environment under a permit (2011/001/KZN/HEARTLANDLEASING) issued in terms of Section 69 of the Integrated Coastal Management Act.</p> <p>APS as a key stakeholder in the environmental authorisation process has provided the Applicant with details of the location of the Huntsman Pipeline and associated restrictions. While the proposed 2AFRICA/GERA (East) Cable System landing at Amanzimtoti does not cross the Huntsman Pipeline in the sea, it does pass through</p>
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a marine area where benthic sampling is undertaken to monitor contaminated sediments. APS engages annually in the Amanzimtoti Marine Benthic Monitoring program to document the marine environmental impacts of the wastewater from companies operating from the Umbogintwini Industrial Complex site. The coordinates of the sampling points, located offshore on the seabed, have been provided to the Applicant with the closest sampling point 19 m away from the route of the proposed cable.

Issues Raised by APS:

APS have raised the following concerns with regards to the installation of the 2AFRICA/GERA (East) Cable System:

- APS is concerned that the proposed cable installation and burial could result in contaminated sediments becoming suspended in the water column thus impacting on marine and benthic communities within the area. The main concern is that sampling only monitors sediments to a depth of 30 cm below the seabed (depth to which the grab bucket takes samples) and the toxicity of soils below this depth is unknown.
- APS has raised their concern that the proposed cable installation could impact on their discharge permit should unforeseen impacts occur.
- Physalia (company appointed to undertake the annual sampling on behalf of APS) raised their concerns that should the cable be laid on the surface the possibility exists for the grab bucket to snag the cable during their sampling operations as the bucket takes sediment samples down to a depth of 30 cm.

Following APS raising their concerns a meeting was held with both APS, ASN, WIOCC, ACER and Physalia to discuss the proposed cable burial operations so that all parties have a clear understanding of the procedure for cable burial and what level of disturbance to sediments is expected. Discussions were also held between all parties to establish if alternatives are available to limit impacts on the receiving environment and to reduce the potential for sediment disturbance.

Cable Burial:

Generally, at depths less than 1000 m, the cable will be buried beneath the sandy seabed. This is typically achieved with the use of a specially designed plough, which is submerged onto the seabed by the cable laying ship. The cable will be fed from the ship to the plough which then feeds the cable into the trench created by the plough shear. Effectively the ploughing involves the plough shear cutting through the sediment to a depth of 2 m through which the cable is fed (plough shear has a width of 20 cm) by pushing the sediment apart. Once the plough shear moves on, the sediment is simply allowed to close on itself again burying the cable.

Please see the following link to see an example of how ploughing takes place:

<https://www.youtube.com/watch?v=SXRG5rpYUP4>

Although water jetting is sometimes used to lubricate the plough shear to make ploughing easier the plough can also be operated 100% mechanically. If this takes place, there is limited disturbance to the sediment and little or no plumes are created due to slow towing speed (it will be like dragging an anchor over the seabed at a speed of 600 m/h = 10 m/min or 0.16 m/s). The only visible disturbance to the seabed will be limited to the tracks made by the plough skids and the plough scar which falls back on itself once the plough moves on.

Discussion:

Given the limited impact on the seabed through cable burial ACER would like to request the departments advice on the following:

- Given the APS concerns regarding their license does the department see any likelihood that the proposed burial of the 2AFRICA/GERA (East) Cable System could jeopardise their permit?

In addition to the above, ACER would like to point out that the contaminated area pointed out by APS is only 619 m in extent which would mean that the ploughing operation could be completed within a period of 1.5 hours (See figure below).

	<p>It should be noted that once installed the cable has a legislated 500 m buffer each side of it which prevents ships from anchoring or fishing (trawling) which will provide an additional level of protection to the area thus limiting the potential for sediment disturbance in the future.</p> <p>Alternatives considered to reduce potential impacts on the receiving environment: Following the meeting held between APS, ASN, WIOCC, ACER and Physalia the ASN cable engineers relooked at the proposed ploughing options and proposed the following alternatives for cable installation over the area of contamination:</p> <p>Preferred Alternative: Undertake cable burial as planned to a depth of 2 m but only using mechanical ploughing. This means that the water jet system which is used to lubricate the plough shear would not be turned on thus limiting the potential for contaminated sediment to become suspended in the water column.</p> <p>Alternative 2: Undertake cable burial to a depth of 0.5 m using only mechanical ploughing. This alternative would reduce the depth to which ploughing takes place thus satisfying Physalia's concerns that the chemical properties of deeper sediments are unknown. A burial depth of 0.5 m would also ensure that the cable cannot be snagged by the grab bucket when annual sampling of the sediments takes place.</p> <p>ACER would welcome the departments view on the alternatives considered above and look forward to your response on this matter.</p> <p>Regards Giles</p>	
<p>15.07.2021 (Email from AECI to DFFE)</p> <p>22.07.2021 (Email from DFFE to AECI)</p>	<p>Email from AECI to DFFE (15.06.2021)</p> <p>Good Day Reuben,</p> <p>I hereby refer to the below stated matter for your information:</p> <p>The Proposed Marine Telecommunications System (2AFRICA/GERA (East) Cable System) to be landed at Amanzimtoti, Kwazulu-Natal on the East Coast of South Africa. (EIA REFERENCE: 14/12/16/3/3/2/2058). (Refer to the email attachment).</p> <p>The proposed project was brought to AECI Property Services' attention during the public participation process initiated by ACER (Africa) Environmental Consultants in April 2021. AECI Property Services has since then registered as an IAP and provided comments on the planned telecommunications line which is expected to intersect the AECI Property Services' Marine Impact Assessment Survey areas as described in the coastal discharge permit: 2011/001/KZN/HEARTLANDLEASING.</p> <p>We have the following concern which has been already communicated to the project team:</p>	<p><b>Response from DFFE (22.07.2021)</b></p> <p>Greetings Nyiko,</p> <p>Apologies for only replying now,</p> <p>Your below email and our telephonic discussion on 21 July 2021 bears reference,</p> <p>We note your concerns that the proposed marine telecommunication system might compromise the conditions and characteristics of the current physio – chemical seabed throughout the survey area. Please be advised that if the environmental authorization approved the alternative that goes through the survey area, the Department will not revoke or suspend the Coastal Waters Discharge Permit of AECI Property Services due to the impacts caused by the propose Marine Telecommunication System.</p> <p>I hope the above is in order,</p> <p>Please contact us should you need further clarity.</p>

Proposed line which is expected to be installed through ploughing might compromise the conditions and characteristics of the current physio – chemical seabed throughout the survey area.

We therefore bring this matter to your attention. We have also requested that the project team consult further with you and the rest of the DEFF Coastal Management team as a key stakeholder for the proposed project.

Should you wish to discuss this matter further, do not hesitate to contact me.

Kind Regards;

NYIKO NYANISI  
Environmental Manager

Thank's and kind regards

Rueben