

PROPOSED MARINE TELECOMMUNICATIONS SYSTEM 2AFRICA (WEST) CABLE SYSTEM TO BE LANDED AT YZERFONTEIN ON THE WEST COAST OF SOUTH AFRICA

NOTIFICATION REVIEW PERIOD (28 OCTOBER 2020 – 28 NOVEMBER 2020)

COMMENTS AND RESPONSE REPORT

Name	Organisation
Dr Johann Augustyn	SADSTIA Executive Secretary
Ms Edwena Booysen	Office of the Premier – Western Cape Government
Mr Eddie Borden	Oxy
Department of Environment, Forestry and Fisheries	DEFF – Oceans and Coasts Acting Director: Coastal Conservation Strategies
Mr Leon Fourie	Swartland Municipality
Mr Basson Geldenhuys	National Department of Public Works and Infrastructure – Chief Town Planner
Mr Gerhard Gerber	Department of Environmental Affairs & Development Planning
Ms Fiona Grimett	Department of Environment, Forestry and Fisheries
Ms Doretha Kotze	West Coast District Municipality – Town and Regional Planner
Ms Lesa La Grange	South African Heritage Resources Agency – Manager: Maritime & Underwater Cultural Heritage
Ms Adri La Meyer	Department of Environmental Affairs & Development Planning
Mr Ashwin Lewis	Darling Black Business Forum – Secretary Office
Dr Duncan Miller	Geology – University of the Free State
Ms Nozipho Mkhabela	I&J Limited
Ms Nicole Muller	Petroleum Agency SA
Ms Natalie Newman	City of Cape Town Metropolitan Municipality
Ms Alexis Olds	CapeNature – Landscape Manager: Landscape West
Commander Christoff Theunissen	Hydrographic Office – Maritime Safety Coordinator
Mr Jacques Van Der Walt	Openserve
Mr Marius Wheeler	CapeNature – Conservation Intelligence Manager
Captain K Whitton	Melkbosstrand SAPS
Ms Briega Williams	South African Heritage Resources Agency – Heritage Officer

Name and Organisation	Comment	Response
<p>Date: 28 10 2020 (Email) Mr Ashwin Lewis Darling Black Business Forum – Secretary Office</p>	<p>As per our earlier telecommunication, we, Darling Black Business Forum, would like to register as I&AP as per the environmental impact assessment for the above said project. We would appreciate the provision of all relevant documentation as per the said project and the contact details of MTN representative as the owner. Hope you find such in order.</p>	<p>Thank you for your email. Please find attached Background Information Document, comment sheets and Notification letter for the above-mentioned Proposed project. We have registered Darling Black Business Forum on the database.</p>
<p>Date: 28 10 2020 (Email) Ms Natalie Newman City of Cape Town Metropolitan Municipality</p>	<p>Thanks for the notification, however as Yzerfontein does not fall within the Jurisdiction of the City of Cape town I will not be commenting.</p>	<p>Thank you for your comment ACER will remove your details from the project database.</p>
<p>Date: 28 10 2020 (Email) Mr Eddie Borden Oxy</p>	<p>You can remove me from the process. Oxy sold our Africa assets to TOTAL last year and we are no longer in the area.</p>	<p>Noted and thank you for your email.</p>
<p>Date: 28 10 2020 (Email) Ms Edwena Booysen Office of the Premier Western Cape Government</p>	<p>We hereby acknowledge the receipt of your correspondence, the content which has been noted, a response will be forthcoming in due course.</p>	<p>Thank you for your acknowledgement email.</p>
<p>Date: 29 10 2020 (Email) Dr Duncan Miller Geology – University of the Free State</p>	<p>The Notice of Environmental Authorisation Process (Environmental Impact Assessment) advertised in the press on 28 October 2020 refers.</p> <p>I would like to register as an Interested Party and obtain further information related to the proposed project to land the proposed 2AFRICA (West) Cable System at Yzerfontein.</p> <p>Dr Stephan Woodborne (iThemba Labs), Dr Mary Evans (Geography, Wits) and Dr Duncan Miller (Geology, University of the Free State) are actively involved in a study of the beach, dune cordon, pans and surficial sediments further inland at Yzerfontein. This study aims to date the various sedimentary bodies in order to determine the history of sedimentation and the vulnerability to erosion of the coastal dunes. The research involving the beach and coastal dune cordon itself is carried out under permit from South African National Parks (Permit number: CRC/2019-2020/006—2018/V1), renewed annually. SANParks has legal jurisdiction over the beach and coastal dunes south of the West Coast National Park boundary as far as Yzerfontein town.</p> <p>Any excavation involved in the laying of the cable across the beach, or through</p>	<p>Thank you for your mail. ACER will add you to the project database and you will receive all further notifications and project documentation as the EIA proceeds. I have asked our Public Participation officer to email you the project Background Information Document for your information.</p> <p>ACER does not foresee any issues with you monitoring the excavations when the cable is laid and the taking of samples to further your academic research into the stratigraphy of the beach. The laying of the cable is only expected to take place once Environmental Authorisation for the project has been obtained as well as the relevant permits to allow excavations on the beach.</p>

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	<p>the coastal dune barrier and surficial sediments further inland may expose stratigraphy relevant to our ongoing academic research. We hereby request permission to monitor any such excavation for relevant geological deposits and to take samples for geodating purposes. Our research would also benefit from being given access to any geological data about the sea floor sediments in Yzerfontein bay.</p> <p>Thank you for sending us the relevant documents so promptly.</p> <p>I note the following with interest. We would be very keen to see this data in due course as it may be very useful in our ongoing research into the near-coastal sand dynamics. "A detailed survey of the sea bottom and geology will be undertaken to inform the proposed cable alignment. Also, a survey will be conducted at the landing site to determine the final alignment of the cable at the shore crossing to access the proposed BMH site at Yzerfontein."</p>	
<p>Date: 29 10 2020 (Email) Ms Nozipho Mkhabela I&J Limited</p>	<p>To aid in our commentary regarding the proposed submarine telecommunications cable 2AFRICA (WEST), could you please send to me the shapefile used to make the map below taken from the BACKGROUND INFORMATION DOCUMENT.</p>	<p>ACER has provided Ms N Mkhabela with the shapefile showing the alignment of the 2AFRICA (West) Cable System.</p>
<p>Date: 29 10 2020 (Email) Commander Christoff Theunissen Hydrographic Office Maritime Safety Coordinator</p>	<p>Thank you for the notification. This office will require the following information at least 72 hours prior to the commencement of operations in order to promulgate a navigation warning:</p> <ul style="list-style-type: none"> a) list of coordinates of the planned cable route during operations b) vessel details, ie name, callsign and any VHF communication channels c) date of commencement and completion of operations d) any supplementary information for minimum berth required, gear streamed, etc. <p>On the completion of operations, we require a detailed coordinate list of the actual cable route in order to update the relevant navigation charts.</p>	<p>Thank you for your comment and the requested information will be made available to your office at least 72 hours before commencement of operations.</p>
<p>Date: 29 10 2020 (Email) Captain K Whitton Melkbosstrand SAPS</p>	<p>Please be informed that Yzerfontein is policed by Darling SAPS. For your convenience I have forwarded this email to the station commander of Darling SAPS, Captain Saayman.</p>	<p>Thank you for your notification email.</p>


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<p>Date: 30 10 2020 (Email) Ms Adri La Meyer Department of Environmental Affairs & Development Planning</p>	<p>Thank you for your e-mail of 28 October 2020. Kindly register the Department of Environmental Affairs and Development Planning as a commenting authority for this S&EIR application. It would be appreciated if you could only keep me as the Department's contact person and exclude all other Departmental officials from your mailing list for this application. I will notify the relevant directorates and officials of the application and future documentation regarding this application.</p> <p>Kindly notify me of the availability of the DSR for comment.</p>	<p>Thank you for your email. ACER will ensure that you are the only contact person for the department and all project notifications will be sent to you for reference. You will be notified of the availability of the DSR once it is completed and been submitted for comment.</p>
<p>Date: 02 11 2020 (Email) Mr Jacques Van Der Walt Openserve</p>	<p>Thank you for these documents. They are well noted. We will review and provide comments, if any. For now, just one question: As we know, the WACS cable is operational, will the EIA include a risk assessment with necessary steps/guidelines to protect the WACS cable from any possible impact during 2Africa activities? Or, this could be more for the scope of work of the Supplier?</p>	<p>All in water crossings are done in line with ICPC Recommendations. No specific Risk Assessment is planned as all cable crossings follow tried and tested industry practice. ASN installed WACS - and when WACS crossed other cables the same process was followed. If the cable crossing is on the beach, then all cables are located before any works commences.</p>
<p>Date: 04 11 2020 (Email) Mr Marius Wheeler CapeNature Conservation Intelligence Manager</p>	<p>Thanks, we acknowledge receipt. Ms Alexis Olds from CapeNature will respond to you in due course.</p>	<p>Thank you for your acknowledgement email.</p>
<p>Date: 04 11 2020 (Email) Mr Basson Geldenhuys National Department of Public Works and Infrastructure – Chief Town Planner</p>	<p>I can confirm that I am aware of the intended processes.</p>	<p>As a landowner we welcome your comment and confirmation that you are aware of the proposed development.</p>
<p>Date: 06 11 2020 (Email) Mr Leon Fourie Swartland Municipality</p>	<p><i>ACER Query "Please can you assist with the contact and email details of the Swartland Municipalities Environmental Manager. Your assistance is highly appreciated"</i></p> <p>We do not have an environmental officer, but you should contact Alwyn Zaayman, our head of planning. His email address is AlwynZaayman@swartland.org.za and office number 0224879400.</p>	<p>Thank you for your response and ACER will include Mr Zaayman onto the project data base so that he receives all future notifications during the EIA process.</p>
<p>Date: 18 11 2020 (Email) Ms Alexis Olds CapeNature – Landscape Manager: Landscape West</p>	<p>RE: Proposed Marine Telecommunications Cable System 2AFRICA (West) Cable System to be landed at Yzerfontein, Western Cape, South Africa - Background Information Document</p>	<p>Thank you for your email and comments received.</p>

Name and Organisation	Comment	Response
	<p>CapeNature would like to thank you for the opportunity to comment on the above report and wish to make the following comments. Please note that our comments pertain only to biodiversity related impacts and not to the overall desirability of the application.</p> <ol style="list-style-type: none"> 1. The application is to undertake the construction and operation of the proposed 2AFRICA (West) Cable System connecting Africa to Europe and the United Kingdom which takes place within the marine and terrestrial environment. The section of the 2AFRICA (West) Cable System which forms part of this Environmental Impact Assessment (EIA) includes the section of cable from where it enters South Africa's Exclusive Economic Zone (EEZ) through South Africa's Territorial Waters (TW) and onto land until it reaches the existing Telkom Cable Landing Station located outside of Yzerfontein, Western Cape on the West Coast of South Africa. <p>The 2AFRICA Cable System comprises the following project components from where it enters South Africa's EEZ until it reaches the current Telkom CLS outside of Yzerfontein:</p> <ul style="list-style-type: none"> • Marine fibre-optic telecommunications cable entering South Africa's EEZ which runs from the marine environment (offshore) to the BMH in Yzerfontein passing through the onshore environment and intertidal zone. • Terrestrial Fibre optic cable that runs from the BMH to the CLS outside of Yzerfontein. <ol style="list-style-type: none"> 2. The preferred landing alternative of the proposed cable will not require construction of a BMH or CLS as the current WACS BMH and CLS operated by Telkom will be used by MTN. This is the more desirable option as it will not cause unnecessary disturbance to the environment by constructing a new CLS and BMH. 3. The National Biodiversity Assessment of 2018 indicates that the cable will run through Southern Benguela Dissipative Sandy Shore (Least Concern) in the nearshore environment, Cape Seashore Vegetation, 	<p>Thank you and it is noted that your comments relate only to biodiversity related impacts.</p> <p>Correct.</p> <p>Correct.</p> <p>Your comment is noted and agreed with.</p> <p>This is correct, if the existing ducts are used for the WACS Cable System no disturbance inland from the beach will take place.</p>

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	<p>and a section of already transformed Langebaan Dune Strandveld (Least Threatened). The area of excavation is relatively small and will be returned to its former state which will result in limited negative impacts.</p> <p>4. In the offshore environment the cable will be buried to a water depth of 1500 m. In the shallow water the cable will be anchored to the seabed where substrate is too hard and where cable burial is not possible. The proposed cable system will cause disturbance to the benthic environment as it will be creating a new pathway, but this disturbance will be temporary and after ploughing the seabed will be left nearly undisturbed. Only temporary track marks from skis and plough share will remain. These will disappear over time with the wave action and currents. This is the most environmentally friendly option for cable installation.</p> <p>5. The PLGR (Pre-Lay Grapnel Run) is beneficial to the receiving environment as it entails removal of debris from the seabed e.g. old fishing nets, ropes/wires and anchor chains. Divers will also be removing debris in the nearshore environment. Removal of debris has a positive impact on the marine environment.</p> <p>6. Marine telecommunications cables are afforded a legislated buffer as defined in the Marine Traffic Act (Act No. 2 of 1981) read together with the Maritime Zones Act (Act No. 15 of 1994). This buffer zone effectively protects the cable from damage due to bottom trawling activities, mineral exploration, and the anchoring of vessels. Therefore, a buffer of 0.5 Nm should be put in place on either side of the cable which will have a positive impact on the benthic communities as no trawling or anchoring of ships is permitted in the buffer zone. It will also act as a refuge for benthic fish species.</p> <p>7. The consultants will commission specialist studies on wetlands, ecology including fauna and flora, marine benthos, onshore and offshore cultural heritage, fisheries and marine environment and beach and coastal dune dynamics. This is supported by CapeNature.</p>	<p>ACER agrees with your comment and the anticipated impacts on the marine benthic environment are considered negligible.</p> <p>Your comment is noted and agreed with.</p> <p>A legislated buffer will be enforced around the cable once installed which will have a positive impact on benthic communities.</p> <p>Your support is noted. Should additional specialist input be required as the assessment progresses these will be commissioned by ACER.</p>

Name and Organisation	Comment	Response
	<p>8. Based on the above, CapeNature does not object to the application.</p> <p>CapeNature reserves the right to revise initial comments and request further information based on any additional information that may be received.</p>	<p>Your support for the proposed development is noted.</p> <p>Noted.</p>
<p>Date: 20 11 2020 (Email) Department of Environment, Forestry and Fisheries Oceans and Coasts Acting Director: Coastal Conservation Strategies</p>	<p>SUBJECT: COMMENTS ON THE BACKGROUND INFORMATION DOCUMENT (BID) FOR THE PROPOSED MARINE TELECOMMUNICATIONS CABLE SYSTEM 2AFRICA (WEST) CABLE SYSTEM TO BE LANDED AT YZERFONTEIN, WESTERN CAPE, SOUTH AFRICA.</p> <p>The Oceans & Coast (O&C) Branch of the Department of Environment, Forestry, and Fisheries (DEFF) has reviewed the proposed Background Information Document for the proposed Marine Telecommunication cable system 2africa (west) cable system to landed at Yzerfontein, Western Cape, South Africa in terms of the National Environmental Management Act, 1998 (Act No. 107 of 1998), ("NEMA") and has provided inputs based on coastal considerations and objectives in terms of the National Environmental Management: Integrated Coastal Management Act, 2008 (Act No. 24 of 2008) ("ICM Act").</p> <ol style="list-style-type: none"> 1. The Environmental Assessment Practitioner (EAP) must take note that the O&C Branch of the DEFF 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. 2. We appreciate the given opportunity to comment on this proposed project. This letter serves as an acknowledgement receipt of the BID and further requests to be registered as an I&AP; 3. Kindly note that the activity may not commence prior to an environmental authorisation being granted by the Competent Authority (CA). It is an 	<p>Thank you for the comments received on the BID. ACER has included your department on the project database and all future reports and project notifications will be submitted to you for your comment.</p>

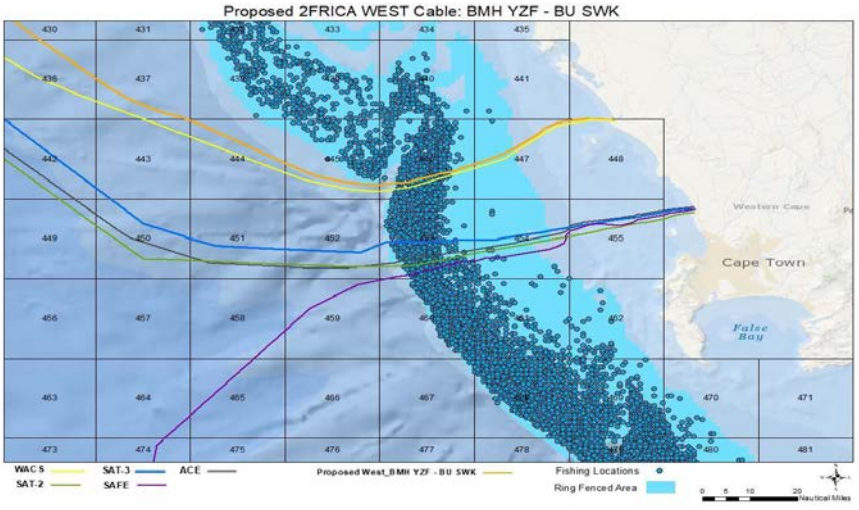
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	<p>offence in terms of section 49A of NEMA for a person to commence with a listed activity unless the CA has granted an environmental authorisation for the undertaking of the activity. A person convicted of an offence in terms of the above is liable to a fine not exceeding 10 million or to imprisonment for a period not exceeding 10 years, or to both such fine and imprisonment.</p> <p>4. Please be advised that there is an EIA Unit that facilitate EIA comments on behalf of the Oceans and Coast Branch. Kindly forward request for EIA Comments to, Email: OCeia@environment.gov.za.</p> <p>5. We will provide comments in the next public participation phase.</p> <p>Kindly note that the Department reserves the right to revise its comments and request further information based on any additional information that might be received. All future correspondence and documentation (hard copy and an electronic copy) must be submitted to our office via OCeia@environment.gov.za / or Physical Address: Department of Environment Affairs (DEA), Branch: Oceans and Coast, 2 East Pier Building, East Pier Road, Victoria and Alfred Waterfront, Cape Town, 8001.</p>	
<p>Date: 23 11 2020 (Email) Ms Fiona Grimett Department of Environment, Forestry and Fisheries Integrated Environmental Authorisations</p>	<p>The attached Public Participation (PP) Plan, dated 02 November 2020, for the proposed 2AFRICA (West) Cable System to be landed at Yzerfontein on the West Coast of South Africa, refers.</p> <p>The Department has reviewed the attached 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. The proposed plan contains suitable public consultation measures, and is hereby approved.</p> <p>Further note, that the attached directions apply with regards to the process for submitting draft documents to the Competent Authority for comment. Please ensure that you attach this PP plan approval to the application form, when submitting to the Department.</p>	<p>Thank you for your approval of the Public Participation Plan submitted. The plan will be submitted to DEFF with the Application for Authorisation.</p>
<p>Date: 24 11 2020 (Date) Dr Johann Augustyn</p>	<p>Comments from SADSTIA members on 2AFRICA West and 2AFRICA Port Elizabeth</p>	<p>Thank you for the comments received on the proposed cable landings forming part of the 2AFRICA/GERA (East) and 2AFRICA (West) Cable</p>

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<p>SADSTIA Executive Secretary</p>	<p>Comment from Oceana:</p> <p>There is reference to a plough which is dragged on the seabed and which then lays the cable in a trough approx. 1 m deep. There are strong currents in this area – loose soil could over time expose cable, so our Skippers need to know the exact position of cable. It is close to the current existing cable which is on the seabed (an obstacle for our fleet for many years).</p> <p>In summary, there is little concern about the Port Elizabeth cable landfall since it has not recently been trawled, but considerable concern about the Yzerfontein area, since these are intensely trawled blocks.</p> <p>We would like to be kept in the loop on future consultations.</p> <p>Comment from Irvin and Johnson:</p> <p>Please see additional PDF document pertaining to both 2AFRICA West and 2AFRICA Port Elizabeth.</p> <p>Map response to 2AFRICA WEST Cable Proposal</p>  <p>Figure 1 General overview of the proposed 2AFRICA (West) Cable System</p>	<p>Systems. ACER will include your comments in the EIA documentation, and we will keep you informed of any future correspondence or reports to be released during the EIA processes.</p> <p>Exact positions of the cable will only be known once installed but the cable position will be shared with the South African Maritime Authority and fishing organisations.</p>

Name and Organisation

Comment

Response



The west cable **BMH YZF – BU SWK** proposed to be landed at Yzerfontein would cross through the ring-fenced area at grids 453 and 447, running close to the already existing WACS cable.

Map response to 2AFRICA/GERA EAST Cable System Proposal

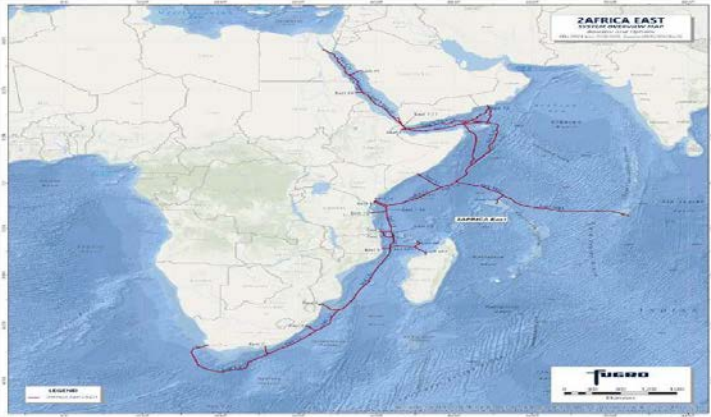
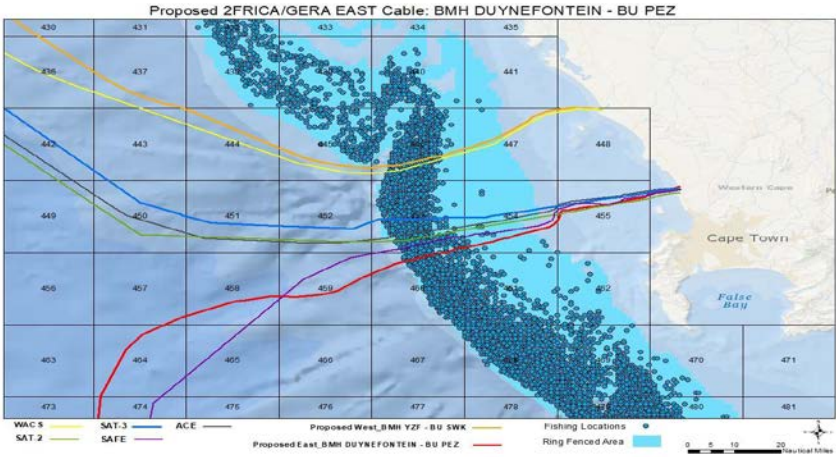


Figure 1 General overview of the proposed 2AFRICA/GERA (East) Cable System

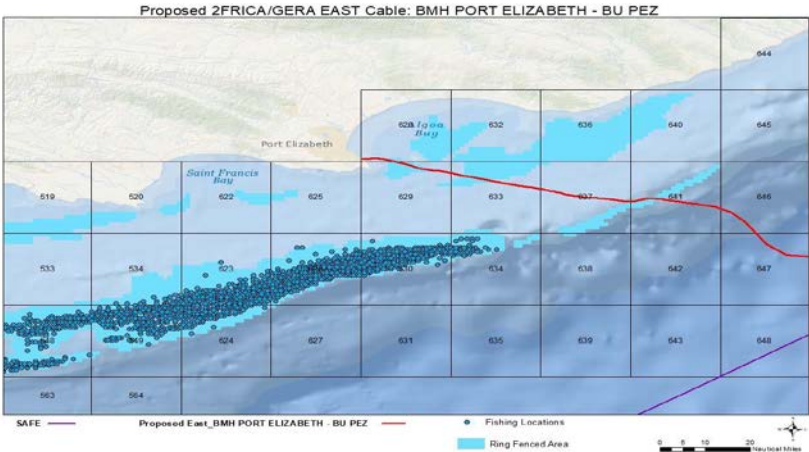
Two connections, **BMH DUYNEFONTEIN-BU PEZ** and **BMH PORT ELIZABETH-BU PEZ**, of the proposed 2AFRICA/GERA east cable system would

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cut through the ring-fenced area.



The **BMH DUYNEFONTEIN-BU PEZ** connection would cut through a 3-grid segment of the fishing ground, south from where other cables already/are proposed to pass through.



The **BMH PORT ELIZABETH-BU PEZ** connection to land in Port Elizabeth would cut through eastern fishing grids that have not been trawled for the past 5 years.

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<p>Date: 26 11 2020 (Email) Ms Doretha Kotze West Coast District Municipality Town and Regional Planner</p>	<p>Kindly register the West Coast District Municipality as an Interested & Affected Party for the proposed development. Information to be sent to: The Municipal Manager: Mr D Joubert mm@wcdm.co.za and/or Records mun@wcdm.co.za</p>	<p>ACER will register you on the project database and you will receive all future correspondence associated with this proposed development.</p>
<p>Date: 26 11 2020 (Email) Mr Gerhard Gerber Department of Environmental Affairs & Development Planning</p>	<p>COMMENT ON THE BACKGROUND INFORMATION DOCUMENT FOR THE PROPOSED MTN 2AFRICA (WEST) MARINE TELECOMMUNICATIONS SYSTEM TO BE LANDED AT YZERFONTEIN, WEST COAST OF SOUTH AFRICA</p> <p>The e-mail notification of 28 October 2020 sent to Premier Alan Winde as well as the similar e-mail notification of 28 October 2020 to this Department which provided a Background Information Document (“BID”) and invitation to participate in the forthcoming environmental impact assessment (“EIA”) application, and the Department’s acknowledgement of receipt of the e-mail notification and registration as a State department for the EIA application, sent via e-mail correspondence on 30 October 2020, refer.</p> <p>Thank you for your proactive engagement with the Western Cape Government on the application via the distribution of a BID.</p> <p>Premier Alan Winde requested that the Department comment on behalf of the Western Cape Government. Please find consolidated comment from various directorates within the Department on the BID, for consideration in drafting the Scoping and/or EIA Reports.</p> <p>1. Directorate: Development Management (Region 1) – Ms Rondine Isaacs (Rondine.Isaacs@westerncape.gov.za):</p> <p><input type="checkbox"/> Based on the information provided in the BID, it is anticipated that the following specialist studies may be undertaken during the EIA phase of the application:</p> <ul style="list-style-type: none"> ▪ Ecology (Vegetation) Assessment; ▪ Cultural Heritage Assessment (Onshore and Offshore); ▪ Fisheries and Marine Assessment; 	<p>Thank you for your email and comments received.</p>

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	<ul style="list-style-type: none"> ▪ Beach and Dune Dynamics Assessment; ▪ Benthic Assessment; and ▪ Wetland Assessment. <p>☐ Please ensure that the National Web Based Environmental Screening Tool developed by the Department of Environment, Forestry and Fisheries (“DEFF”) is consulted to generate a Screening Report. Although the Screening Report must be included in the submission of the application for environmental authorisation (“EA”) to the competent authority, please also include a copy of the Screening Report in the Draft Scoping Report (“DSR”). Based on the findings of the Screening Report, the environmental assessment practitioner (“EAP”) will be required to either appoint additional specialists to undertake the identified specialist studies, or to provide a motivation in the DSR why the specialist studies will not be undertaken or deemed necessary for the EIA process.</p> <p>☐ Since the application for EA will be submitted to the competent authority post 09 May 2020, please confirm whether any Protocols (promulgated in Government Notice (“GN”) No. 320 of 20 March 2020) are applicable to the application. The Terrestrial Biodiversity and Aquatic Biodiversity Protocols may be applicable to the application, as it is noted that an Ecological Assessment will be undertaken. Where an assessment protocol is prescribed for one of the environmental themes included in the Protocol, the specialist assessment must comply with the Protocol. Please therefore ensure that the terms of reference for the specialist studies include the requirements of the Protocols, where applicable.</p> <p>☐ Where a specialist assessment is required, but no specific environmental theme protocol has been prescribed, the level of assessment must be based on the findings of the site verification and must comply with Appendix 6 of the National Environmental Management Act, 1998 (Act No. 107 of 1998) (“NEMA”) EIA Regulations, 2014 (as amended).</p> <p>☐ Please ensure to include the South African Heritage Resources Agency</p>	<p>The DEFF screening report has been included in the application for environmental authorisation which is available in Appendix 1 of the Draft Scoping Report.</p> <p>Relevant protocols will be abided by and the specialists will be requested to conform to the applicable protocols specific to their discipline.</p> <p>Noted and this will be abided by.</p> <p>Heritage Western Cape and SAHRA have been consulted with regards</p>

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	<p>and Heritage Western Cape in the list of State departments that will be consulted, especially in terms of commenting on the Onshore and Offshore Cultural Heritage Assessment.</p> <p><input type="checkbox"/> Please note that NEMA EIA Regulations, 2014 and the three Listing Notices (GN No. R. 983, R. 984, and R. 985) were <u>amended</u> on 7 April 2017 and 13 July 2018, and thus remain in effect, i.e. it is not new <u>regulations</u>. Please be advised to consider referencing as the “NEMA EIA Regulations, 2014 (as amended)” in future documentation.</p> <p><input type="checkbox"/> This Directorate will provide further comments on the DSR and associated Plan of Study for EIA, when made available for comment.</p> <p>2. Directorate: Waste Management – Mr Thorsten Aab (Thorsten.Aab@westerncape.gov.za):</p> <p><input type="checkbox"/> Waste such as fishing nets, ropes, cables, plastic, tyres, nylon, metal, etc. that are encountered during the proposed cable installation, either by the submarine cable plough or by divers, must be removed from the ocean and disposed of on land at a licenced waste facility. This waste stream must be temporally stored on-board a vessel until it can be safely managed on land.</p> <p><input type="checkbox"/> The sorting, recycling or safe treatment of this waste stream should be prioritised over the disposal thereof at a suitable waste disposal facility, as far as is practically possible. Care must be taken that this waste no longer poses a threat of entangling waste pickers or other operational staff, or compaction plant and vehicles at the waste disposal facility.</p> <p><input type="checkbox"/> The burning of this waste should be prevented as it can lead to harmful atmospheric emissions.</p> <p>3. Directorate: Biodiversity and Coastal Management – Ms Mercia Liddle / Ms leptieshaam Bekko</p>	<p>to the proposed development.</p> <p>Noted with thanks.</p> <p>Noted.</p> <p>If waste is collected during cable route clearance the waste will be stored on the vessel and then disposed of on land at an approved and licensed waste facility.</p> <p>Where recycling is possible this will be undertaken rather than disposing of waste to a waste facility.</p> <p>No burning of waste will take place.</p>

Name and Organisation	Comment	Response
	<p>(Mercia.Liddle@westerncape.gov.za):</p> <ul style="list-style-type: none"> <li data-bbox="481 252 1305 624">❑ The stretch of coast where the proposed marine telecommunications cable will enter Yzerfontein Beach forms part of an Ecological Support Area (“ESA”) by means of a Foredune and Coastal corridor. ESAs are not essential for meeting biodiversity targets, but they play an important role in supporting the functioning of Protected Areas or Critical Biodiversity Areas and are often vital for delivering ecosystem services. According to the Western Cape Biodiversity Spatial Plan (2017), the objective of ESAs is to maintain it in a functional, near-natural state. Some habitat loss is acceptable, provided that the underlying biodiversity objectives and ecological functioning are not compromised. <li data-bbox="481 671 1305 938">❑ The applicant should note that the surrounding areas leading to the proposed cable landing station forms part of the West Coast National Park and some surrounding areas form part of the Yzerfontein Nature Reserve. The respective management objectives of the protected areas must be considered in the application for EA. It should also be noted that the Sixteen Mile Beach Marine Protected Area is located north of the proposed end cable and its importance should also be recognised in the assessment process. <li data-bbox="481 986 1305 1150">❑ The applicant and EAP are advised to undertake the necessary environmental screenings to identify the best landing alternatives and cable alignments to reach the cable landing station. Ideally, the preferred alternative should not require additional disturbance to the receiving environment. <li data-bbox="481 1198 1305 1457">❑ The National Environmental Management: Integrated Coastal Management Act, 2008 (Act No. 24 of 2008) (“NEM: ICMA”) provides a framework for the integrated management of the coast with the aim of preserving, protecting, extending and enhancing the status of coastal public property, and securing equitable access to the benefits and opportunities of the coast. As such, the NEM: ICMA provides for various zones and provides a framework for the management of these zones. 	<p>The footprint of the proposed cable system is so small that no underlying biodiversity objectives and ecological functioning will be compromised. Installation of the cable is also a very quick process so disturbance to the benthic environment is short lived.</p> <p>No disturbance to the terrestrial environment will take place as the cable will be accommodated in cable ducting installed when the WACS Cable System was landed.</p> <p>The preferred alternative is the best possible environmental option in terms of reducing impacts on the receiving environment.</p> <p>Your comment is noted and the EAP is aware of the ICMA framework.</p>

Name and Organisation	Comment	Response
	<ul style="list-style-type: none"> <li data-bbox="481 252 1305 799">❑ Because of climate change, it was predicted that the Western Cape would experience, <i>inter alia</i>, changes in temperature, decrease in rainfall and an increase in the frequency and magnitude of storm surges along the coast. The increased effects of climate change, sea level rise and increased storm surges in coastal environments obliges the Department to take a more cautious approach in considering development along the coast. In 2016, the Department commissioned the refinement of the delineation of the West Coast Coastal Management Line to ensure that development is regulated in a manner appropriate to the risks and sensitivities in the coastal zone. The principle purpose of the coastal management line (“CML”) is to protect coastal public property (“CPP”), private property and public safety; to protect the coastal protection zone (“CPZ”); and to preserve the aesthetic value of the coastal zone. The use of the CML is of importance in response to the effects of climate change, as it involves both a quantification of risks and pro-active planning for future development. <li data-bbox="481 842 1305 1042">❑ Please be advised that the proposed development and associated activities will enter the CPZ as defined in section 16 of the NEM: ICMA, and fall seaward of the West Coast CML. The purpose of the CPZ is to avoid increasing the effect or severity of natural hazards in the coastal zone, and to protect people and properties from risks arising from the dynamic coastal processes, including the risk of sea level rise. <li data-bbox="481 1085 1305 1393">❑ This Directorate notes that the proposed development will entail excavation and depositing of more than 5m³ of material within 100m of the highwater mark of the sea for trenching and backfilling of the marine telecommunications cable during the installation phase. Additionally, it is also noted that the proposed development will require digging of a trench along the CPP into the intertidal zone. As such, the applicant should consider the importance of the CPZ and ensure that the ecological integrity of the affected area will not be compromised during construction phase of the proposed project. <li data-bbox="481 1401 1305 1457">❑ The landing of the proposed marine telecommunications system will enter the littoral active zone (“LAZ”) of Yzerfontein Beach and will 	<p data-bbox="1328 252 2098 347">Agreed, a specialist will be appointed to assess the beach and coastal environment to identify any impacts or possible threats to the cable and coastline through the landing of the cable at the preferred alternative.</p> <p data-bbox="1328 842 1585 866">Your comment is noted.</p> <p data-bbox="1328 1085 2098 1181">Agreed, a specialist will be appointed to assess the beach and coastal environment to identify any impacts or possible threats to the cable and coastline through the landing of the cable at the preferred alternative.</p>

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	<p>impact the coastal dune cordon. The NEM: ICMA, 2008 defines the "littoral active zone" ("LAZ") as: "means any land forming part of, or adjacent to, the seashore that is –</p> <ul style="list-style-type: none"> ▪ <i>unstable and dynamic as a result of natural processes; and</i> ▪ <i>characterised by dunes, beaches, sand bars and other landforms composed of unconsolidated sand, pebbles or other such material which is either unvegetated or only partially vegetated;</i>". <ul style="list-style-type: none"> ▪ As such, the applicant is advised to consider the potential impacts that the proposed development may have on this receiving environment. <p><input type="checkbox"/> In terms of access to the coast, be advised that the Department has commissioned the Western Cape Provincial Coastal Access Audit – West Coast Municipal District, which was finalised in November 2019. According to this Access Audit, the proposed cable landing site has been identified as a site with restricted access as it is located near private property, but longshore pedestrian access is possible and may not be denied. As such, the applicant should ensure that measures are taken not to prohibit members of the public from accessing coastal public property</p> <p><input type="checkbox"/> This Directorate would like to advise the applicant to ensure that the following permits from the relevant authorities are obtained: Seashore Lease Permit; a Permit to construct infrastructure on coastal public property, and an Off-Road Vehicle ("ORV") Permit.</p> <p><input type="checkbox"/> Please be advised that driving excavators or vehicles on the beach is prohibited without an ORV Permit as per the NEM: ICMA Control of Use of Vehicles in the Coastal Area Regulations (GN No. R. 496 of 27 June 2014). As such, the applicant may obtain the relevant forms/ documentation to apply for an ORV Permit from the DEFF: Oceans & Coasts Branch at ORVPermitting@environment.gov.za or from Sibusiso Mbethe at Smbethe@environment.gov.za.</p> <p><input type="checkbox"/> The applicant must implement a waste management strategy to ensure</p>	<p>A specialist will be appointed to assess the beach and coastal environment to identify any impacts or possible threats to the cable and coastline through the landing of the cable at the preferred alternative.</p> <p>Public access to the beach will not be prohibited during cable landing however the works area will be demarcated to prevent the public from accessing the works area where they could be injured. The landing of the cable on the beach is not expected to take longer than 2 days to complete.</p> <p>Noted and this permit will be applied for once environmental authorisation has been granted.</p> <p>Noted and this permit will be applied for once environmental authorisation has been granted.</p> <p>Waste management will be addressed in the EMP to be developed for</p>

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	<p>that any form of pollution that may occur during the construction phase, is restricted or avoided. Any waste generated that cannot be re-used or recycled, must be disposed at a licenced waste disposal facility.</p> <p>4. Directorate: Pollution and Chemicals Management – Mr Gunther Frantz (Gunther.Frantz@westerncape.gov.za):</p> <p><input type="checkbox"/> This Directorate has no comments on the BID and awaits the DSR and Plan of Study for EIA.</p> <p>5. Please direct any enquiries to the official/s indicated in this correspondence should you require any clarity on any of the comments provided.</p> <p>The Department reserves the right to revise initial comments and request further information based on any information received.</p>	<p>the proposed cable landing. All waste which cannot be recycled will be disposed of at a licensed waste facility.</p> <p>Noted with thanks.</p> <p>Noted with thanks.</p>
<p>Date: 01 12 2020 (Email) Ms Nicole Muller Petroleum Agency SA</p>	<p>Please find attached a list of interested and affected parties as well as their contact details. If any assistance is required, please do not hesitate to contact the Agency.</p> <p>RE: PROPOSED MARINE TELECOMMUNICATIONS CABLE SYSTEM 2AFRICA (WEST/ EAST) CABLE SYSTEM TO BE LANDED AT YZERFONTEIN AND PORT ELIZEBETH IN THE WESTERN AND EASTERN CAPE, SOUTH AFRICA - BACKGROUND INFORMATION AND INVITATION TO PARTICIPATE IN AN ENVIRONMENTAL AUTHORISATION PROCESS</p> <p>Receipt of the above-mentioned communication is hereby acknowledged. Kindly be advised that according to our records your proposed cable route may affect a number of holders of permits/ rights for petroleum. You are therefore required to consult with the permit/ right holders as interested and affected parties. A list of permit/ right holders with their contact details is attached.</p>	<p>Thank you for your comments and the list of interested and affected parties. They will be added to the project data base and will be engaged with during the Environmental Impact Assessment process.</p>
<p>Date: 04 12 2020 (Email) Ms Briege Williams (Heritage Officer) Ms Lesa La Grange</p>	<p>Proposed 2AFRICA (West) submarine fibre optics cable system to be landed at Yzerfontein, Swartland Municipality, Western Cape</p> <p>The South African Heritage Resources Agency (SAHRA) would like to thank you</p>	<p>Thank you for the comments provided. A suitably qualified Maritime Archaeologist will be appointed to access the possible impacts on maritime heritage resources.</p>

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(Manager: Maritime & Underwater Cultural Heritage) South African Heritage Resources Agency	<p>for submitting the Background Information Document (BID) for the proposed 2AFRICA (West) submarine fibre optics cable system to be landed at Yzerfontein, Swartland Municipality, Western Cape, South Africa.</p> <p>As part of the Environmental Authorisation process a Scoping Report and Environmental Impact Assessment (EIA) must be completed. The BID has already 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>There are no known wrecks at the landing site of the cable, however the proposed cable runs to the north of Dassen Island which has a large number of known wrecks in the waters surrounding it. Most of the wrecks are close to the island but there is a possibility that unrecorded wrecks may also lie in area of the proposed route north of the island.</p> <p>Further away from the island there are a number of modern wrecks (Apollo Sea (1994), Shing Tung Yong (1978) and St Gerard (1983)) that are recorded as possibly lying in the vicinity of the proposed route of the cable, while these are modern, care must be taken to avoid them as they are a potential hazard.</p> <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. Should you have any further queries, please contact the designated official using the case number quoted above in the case header.</p> <p>CaseID: 15812</p> <p>1. This approval does not exonerate the applicant from obtaining local</p>	

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	<p>authority approval or any other necessary approval for proposed work.</p> <p>2. If any heritage resources, including graves or human remains, are encountered they must be reported to SAHRA immediately.</p> <p>SAHRA reserves the right to request additional information as required.</p>	