

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

DRAFT ENVIRONMENTAL IMPACT ASSESSMENT REPORT PERIOD (28 May – 29 June 2021)

COMMENTS AND RESPONSE REPORT

Name	Organisation
John Gribble	Heritage Specialist
Briege Williams	South African Heritage Resources Agency – Heritage Officer
Lydia Kutu	DFFE - Integrated Environmental Authorisations
Mr Alfons van Craeynest - Hydrographic Officer	SAMSA – Superintendent Paper Chart Production
Alana Duffell – Canham – Cape Nature	Cape Nature - Landscape Conservation Intelligence Manager Biodiversity Capabilities
Keshni Rughoobee - HOD	Head of Depart – Department of Environmental Affairs & Dev Planning
Ben Tromp	Yzerfontein Conservancy
Nelisa Ndobeni	Department of Human Settlements, Water and Sanitation
Phumla Ngesi	Petroleum Agency of South Africa (PASA) - Env Compliance Manager

Name and Organisation	Comment	Response
<p>Date: 28.05.2021 E Mail: John Gribble Heritage Specialist</p>		<p>Good day John</p> <p>Trust my mail finds you well, please find below the links to be uploaded onto SAHRA website.</p> <p>Please advise once documents have been uploaded in order for us to then inform SAHRA.</p> <p>Duynefontein: https://wettransfer.com/downloads/1442aefdb9f13df8548a3419bdecb65c20210527085042/baa0a2</p> <p>Yzerfontein: https://wettransfer.com/downloads/297ddca8c1f26fd69489e6e7bf693b1d20210527081104/ddd664</p>
<p>Date: 30.05.2021 E Mail: John Gribble</p>	<p>I've been uploading the Duynefontein and Yzerfontein EIAs to SAHRIS but have limited the upload to those documents that are relevant to SAHRA, rather than uploading everything. Perhaps when you contact Briega to let her know the documents have been loaded onto SAHRIS for comment you can send her the link you sent me and ask whether they would want to see any of the other documents loaded to SAHRIS.</p> <p>Both cases on SAHRIS have now been updated with the uploads and marked as 'submitted' so SAHRA will be able to see them.</p>	<p>Thank you for your mail , will contact Briega and advise</p>
<p>Date: 28.05.2021 E Mail Briega Williams</p>	<p>.</p>	<p>PROPOSED MARINE TELECOMMUNICATIONS CABLE SYSTEM (2 AFRICA/WEST CABLE SYSTEM) TO BE LANDED AT YZERFONTEIN ON THE WEST COAST OF SOUTH AFRICA</p> <p>Dear Briega</p> <p>The DEIA documents for the above-mentioned project will shortly be uploaded to SAHRIS for your review and comment. Please advise once</p>

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		you have received the documents.																									
<p>Date: 31.05.2021E Mail Mr Alfons van Craeynest Hydrographic Officer Superintendent Paper Chart Production SAMSA</p>	<p>We spoke on Friday regarding the proposed marine telecommunications cables currently undergoing an environmental authorisation process.</p> <p>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.</p> <p>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.</p> <p>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. If there are any proposed cable installations planned for the future, it would be important for us to know in order to take the appropriate action.</p> <p>As requested, these are the contact details for James Collicot from SAMSA: (Email address withheld). He will most likely direct you to the appropriate person or department.</p>	<p>Thank you for the comments received which ACER passed on to the ASN team to get clarity on the proposed landing schedules for the 2AFRICA/GERA (East) and 2AFRICA (West) cable systems to be landed in South Africa. Please be advised that ASN have also stated that they will contact your office as well Mr James Collicot from SAMSA well in advance of the proposed installation dates.</p> <p>Subject: RE: 2Africa SOUTH AFRICA HYDROGRAPHIC OFFICE REQUEST FOR PLANNED INSTALLATION DATES EIA Query</p> <p>The information we have received so far is as below.</p> <table border="1" data-bbox="1249 781 1969 1089"> <thead> <tr> <th>Project</th> <th>Site</th> <th>POW</th> <th>Start</th> <th>Finish</th> </tr> </thead> <tbody> <tr> <td>2AFRICA GERA</td> <td>Duynfontein, South Africa</td> <td>SIMBA GERA Issue AH</td> <td>16/08/22</td> <td>29/08/22</td> </tr> <tr> <td>2AFRICA GERA</td> <td>Port Elizabeth, South Africa</td> <td>SIMBA GERA Issue AH</td> <td>12/09/22</td> <td>25/09/22</td> </tr> <tr> <td>2AFRICA GERA</td> <td>Amanzimtoti, South Africa</td> <td>SIMBA GERA Issue AH</td> <td>03/10/22</td> <td>16/10/22</td> </tr> <tr> <td>2AFRICA WEST</td> <td>Yzerfontein, South Africa</td> <td>SIMBA WEST POW Issue 1.1</td> <td>19/04/23</td> <td>02/05/23</td> </tr> </tbody> </table> <p>Need anything else, please don't hesitate to contact me.</p> <p>Regards,</p> <p>Patrick McCloskey</p> <p>.</p>	Project	Site	POW	Start	Finish	2AFRICA GERA	Duynfontein, 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
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<p>Date: 01.06.2021 E Mail Briege Williams</p>	<p>I have now issued the comment for the above case and uploaded it onto SAHRIS, I have also attached a PDF copy to this email.</p>	<p>Thank you for your response.</p>																									

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SAHRA – Heritage Officer	<p>There are just a few small errors in the DEIA that need adjusting but apart from that I am happy with it.</p> <p>You will see in the comment that I have addressed a paragraph in the EMPr that we were unhappy with. On page 27 under the “Offshore” section the 3rd bullet point reads:</p> <p>“Due to the dynamic nature of the environment, any possible archaeological or palaeontological material encountered in these activities must be immediately collected by the diver or operator before it is lost. The ECO and/or the monitoring archaeologist must be informed and take custody of the find and obtain its context. All such finds must be recorded, and their contextual information (a report) must be deposited at an SAHRA-approved institution.”</p> <p>While I agree with the sentiment that it is better to collect something than lose it forever, my worry is that this paragraph could be open to interpretation, people could take stuff and then claim it was about to be lost if they hadn’t picked it up (this has happened in the past). I think it would be better to re-word it with something along the lines of “<i>Due to the dynamic nature of the environment, should any possible archaeological or palaeontological material be disturbed during these activities it must be immediately reported to the ECO and/or the monitoring archaeologist for further advice. Any finds accidentally disturbed must be recorded, and their contextual information (a report) must be deposited at an SAHRA-approved institution.</i>”</p> <p>I hope this makes sense but please feel free to contact me if you need further clarity.</p> <p>Proposed 2AFRICA (West) submarine fibre optics cable system to be landed at Yzerfontein, Swartland Municipality, Western Cape : CaseID: 15812</p> <p>The South African Heritage Resources Agency (SAHRA) would like to thank you for submitting the Draft Environmental Impact Assessment Report (DEIAR) for the proposed 2AFRICA (West) submarine fibre optic cable system to be landed at Yzerfontein, Westcoast District, Western Cape, South Africa.</p>	<p>Your comment is noted and has been addressed in the Final EMPr.</p> <p>Thank you for the proposed rewording. This has been included in the Final EMPr.</p> <p>Thank you and ACER will do so if the need arises.</p>

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	<p>As part of the Environmental Authorisation process a Scoping Report was undertaken which SAHRA commented on in March 2021 and recommended that a Maritime Heritage Impact Assessment (MHIA) be included as part of the Environmental Impact Assessment. SAHRA also requested a change to a paragraph relating to the remit of the agency be amended to reflect the correct information.</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>SAHRA has reviewed the document and is pleased to note that the recommended amendment regarding the remit of the agency has been made. The MHIA included as part of the DEIR sets out the historical background of the area and considers the likelihood of encountering heritage resources. This research has informed the recommendations laid out in the MHIA which have been incorporated into the DEIR under section 10.5. These recommendations are:</p> <ul style="list-style-type: none"> • No mitigation is proposed in deep and shallow water • In inshore waters and on the beach crossing, it is recommended that an alert for the occurrence of submerged prehistoric archaeological material, be included in the EMPr for the project, specifically for the divers working in the shoreface and the operators excavating the trench in the beach and dune. 	<p>Thank you for your approval.</p>

Name and Organisation	Comment	Response
	<ul style="list-style-type: none"> • Due to the dynamic nature of the environment, any possible archaeological or paleontological material encountered in these activities must be immediately collected by the diver or operator before it is lost. The ECO and/or the monitoring archaeologist must be informed and take custody of the find and obtain its context. All such finds must be recorded, and their contextual information (a report) must be deposited at an SAHRA approved institution. • Any further geophysical data generated to support to installation of the cable system must be archaeologically reviewed for the presence of historical shipwrecks or related material. • Should the data identify wreck material at or near the location of any portion of the cable, micro-siting of the cable and/or the possible implementation of an exclusion zone around the archaeological feature should be sufficient to mitigate the risks to the site • Should any maritime archaeological sites or material be accidentally encountered during laying the cable, work must cease in that area until the project archaeologist and SAHRA have been notified, the find has been assessed by the archaeologist, and agreement has been reached on how to deal with it. <p>All but one of these recommendations are supported by SAHRA and must be adhered to especially in the event that any cultural heritage should come to light. The recommendation that is not supported by SAHRA is the third point which reads: “Due to the dynamic nature of the environment, any possible archaeological or palaeontological material encountered in these activities must be immediately collected by the diver or operator before it is lost. The ECO and/or the monitoring archaeologist must be informed and take custody of the find and obtain its context. All such finds must be recorded, and their contextual information (a report) must be deposited at an SAHRA-approved institution.”</p> <p>This paragraph must be edited as it currently bypasses important legal</p>	<p>This statement has been amended as per SARHA’s suggestion and included in both the FEIAR and the EMPr.</p>

Name and Organisation	Comment	Response
	<p>requirements as set out in Sections 35(3) and 35(4) of the NHRA which respectively state that “Any person who discovers archaeological or palaeontological objects or material or a meteorite in the course of development or agricultural activity must immediately report the find to the responsible heritage resources authority, or to the nearest local authority offices or museum, which must immediately notify such heritage resources authority” and “No person may, without a permit issued by the responsible heritage resources authority – (a) destroy, damage, excavate, alter, deface or otherwise disturb any archaeological or palaeontological site or any meteorite; and (b) destroy, damage, excavate, remove from its original position, collect or own any archaeological or palaeontological material or object or any meteorite.” It must be noted that neither approval of this development nor issuing of a comment in terms of NHRA Section 38(8) exonerate the developer from applying for a permit as contemplated in NHRA Section 35(4) should the need arise as no heritage resources may be disturbed without such a permit from SAHRA.</p> <p>SAHRA suggests that it is replaced with the following sentence: “Due to the dynamic nature of the environment, should any possible archaeological or palaeontological material be accidentally disturbed during these activities it must be immediately reported to the ECO and/or the monitoring archaeologist for further advice. Any finds accidentally disturbed must be recorded, and their contextual information (a report) must be lodged with a SAHRA-approved institution.”</p> <p>It is noted that this recommendation originated as part of the HIA and is also included on page 27 of the EMPr. SAHRA therefore requests that this paragraph is amended in each of the three documents (i.e., the HIA, DEIAR, and EMPr).</p> <p>There are two further small errors which need to be amended in the Final EIA, they are:</p> <ol style="list-style-type: none"> 1. In Section 2.2.5 Table 2 states that the authority for issuing a Cultural Heritage Permit is SAHRA, it must be clarified that SAHRA is the authority for any permits required below the High-Water Mark (as 	<p>This paragraph has been amended in all three documents as requested.</p> <p>Your comment is noted, and Table 2 has been amended in the FEIAR.</p>

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	<p>correctly stated in the table) but Heritage Western Cape is the authority for issuing cultural heritage permits above the High-Water Mark.</p> <p>2. On page 95 under section 6.6.3 the U boat is listed as U-1769 when the correct number is in fact U-179, it is noted that it is also incorrect in the HIA. This error must be rectified to avoid any confusion</p> <p>Should any shipwrecks be identified as part of this project then SAHRA must be notified to enable the information to be added to the national shipwreck database. Any new discoveries or updated data is a valuable resource in adding to our knowledge of South Africa's maritime history.</p> <p>Should you have any further queries, please contact the designated official using the case number quoted above in the case header.</p>	<p>Noted. This has been corrected in the FEAIR.</p> <p>Thank you for your comments and input during the EIA process.</p>
<p>Date: 02.06.2021 E Mail Lydia Kutu Integrated Environmental Authorisations</p>	<p>ACKNOWLEDGEMENT OF RECEIPT OF THE DRAFT ENVIRONMENTAL IMPACT ASSESSMENT REPORT FOR THE PROPOSED ALCATEL SUBMARINE NETWORKS (ASN) 2AFRICA (WEST) SUBMARINE FIBRE OPTICS CABLE SYSTEM TO BE LANDED AT YZERFONTEIN, WESTERN CAPE PROVINCE.</p> <p>The Department confirms having received the Draft Environmental Impact Assessment Report for the abovementioned project on 28 May 2021. You have submitted these documents to comply with the National Environmental Management Act, 1998 (Act No. 107 of 1998) and the Environmental Impact Assessment (EIA) Regulations, 2014, as amended.</p> <p>Please take note of Regulation 40(3) of the EIA Regulations, 2014, as amended, which states that "Potential or registered interested and affected parties, including the competent authority, may be provided with an opportunity to comment on reports and plans contemplated in subregulation (1) prior to submission of an application but must be provided with an opportunity to comment on such reports once an application has been submitted to the competent authority."</p>	<p>All I&APs and commenting authorities have been provided with the opportunity to comment on the DEIAR.</p>

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	<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 these Regulations.</p> <p>You are hereby reminded of Section 24F of the National Environmental Management Act 1998 (Act No. 107 of 1998), as amended, that no activity may commence prior to an Environmental Authorisation being granted by the Department.</p>	<p>ACER is fully aware of the legislated EIA timeframes and will ensure all reports are submitted timeously.</p> <p>No activities will commence prior to issuance of environmental authorisation and the required permits for construction.</p>
<p>Date: 21.06.2021 E Mail Alana Duffell-Canham Landscape Conservation Intelligence Manager - Biodiversity Capabilities – Cape Nature</p>	<p>Please note that the contact person for development applications in the West Coast region is Mr Ismat Adams: (Email address withheld)</p>	<p>Thank you for your mail received. ACER has updated the contact details and included Mr Adams on the project database.</p>

<p>Date: 29.06.2021 E Mail Ismat Adams – Conservation Intelligence Manager – Cape Nature</p>	<p>Cape Nature would like to thank you for the opportunity to comment on this application. Our comments are as follows:</p> <p>1. Given the low impacts of the cable laying activity as per the marine ecology, beach and dune, avifaunal, marine mammal, terrestrial ecology, and freshwater assessment, it appears that the overall environmental impact of cable laying activity will be low and could therefore proceed. We do, however, have the following further comments.</p> <ul style="list-style-type: none"> • The cabling route must avoid benthic marine flora and fauna that do not have high resilience. • Ploughing appears more favourable than jetting due to the substantially larger amount of sedimentation that will occur from jetting that will also impact a larger area. • The cable laying activity should not impact cetacean migration or breeding. The construction programme would need to take this into account. 	<p>Thank you for the comments received on the Yzerfontein DEIAR. Your comments will be addressed and included in the FEIAR to be submitted to DFFE for decision making.</p> <p>Thank you for your support.</p> <p>The alignment of the cable has been selected to avoid substrates which have high species diversity, and it is the EAP's opinion that the preferred alignment is the best option in terms of the impacts on marine fauna and flora.</p> <p>Ploughing is the preferred method for cable installation although jetting is required in the shallow water environment through the surf zone to ensure suitable burial depths are obtained for the cable.</p> <p>Cetacean migration patterns will be taken into consideration during project scheduling and ASN will appoint a suitably qualified crew member as a designated Marine Mammal / Protected Species Observer (MMO/PSO). Data collected should include position, distance from the vessel, swimming speed and direction, and obvious changes in behaviour (e.g., startle responses or changes in surfacing/diving frequencies, breathing patterns.)</p>
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	<ul style="list-style-type: none"> • In principle, we do not support construction activity within MPA area and ideally the cabling route should not traverse any portion of MPA. • Alternative 1 cable landing site is supported as there is existing infrastructure in place to which the cable will be connected, that will be of low impact to the wetland system, fauna and flora as per the findings of the terrestrial ecology and freshwater assessment. Furthermore, this alternative has also been supported by the dune impact assessment. • The recommendations by the marine mammal assessment for a MMO to be appointed and cable laying to avoid main migration seasons are supported. • The recommendation by the avifaunal assessment that route planning avoids all important Bird Areas, Marine Protected Areas, other important onshore areas and other marine islands, is supported. • The cabling route should avoid CBA and ESA areas depicted in figure 14 of the EIR. • All mitigation measures and recommendations put forward by the marine ecology, beach and dune, avifaunal, marine mammal, terrestrial ecology and freshwater assessment must be implemented. <p>Cape Nature reserves the right to revise initial comments and request further information based on any additional information that may be received.</p>	<p>The proposed cable alignment does not traverse any MPA's.</p> <p>Your support for the preferred landing site is appreciated.</p> <p>Thank you for your support.</p> <p>Thank you for your support.</p> <p>The avoidance of the CBA and ESA areas as shown in Figure 14 is not possible. The alignment has been selected based on the consideration of several factors including the impacts on marine benthic communities. It is the EAP's opinion that the proposed alignment is the best environmental option available for the landing of the cable in Yzerfontein.</p> <p>All the mitigation measures put forward in the specialist studies have been included in the EMPr.</p> <p>Your comment is noted and ACER thanks you for your comments to date.</p>
<p>Date: 29.06.2021 E Mail : Keshni Rughoobee - Dept of Env Affairs and Development Planning Western Cape Government</p>	<p>1) This Directorate is satisfied that its comments on the DSR have been addressed in the Draft EIA Report.</p> <ul style="list-style-type: none"> • The activity description must be amended to include an indication of the location for vehicle access to the beach. Furthermore, the length of the proposed fibre optic cable for the terrestrial component of the cable 	<p>Thank you for your confirmation that your comments have been addressed in the DEAIR.</p> <p>Vehicle access to the beach will be from the closest municipal beach access point which is located approximately 14 m south of the cable alignment onto the beach (33°20'24.25"S and 18° 9'40.31"E). This</p>

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	<p>system must be provided in the Draft EIA Report.</p> <ul style="list-style-type: none"> • Given that the Compliance Statement for Terrestrial and Freshwater Ecosystems (compiled by Capensis dated April 2021) confirmed that no wetlands or other watercourses are located in close proximity to the preferred cable route and that no water use authorisation is required, it is advised that a comment from the Department of Water and Sanitation be obtained and included in the Final EIA Report to confirm that no authorisation in terms of the National Water Act, 1998 (Act No. 36 of 1998) is required. • Proof of the public participation process conducted must be included in the Final EIA Report. • The description of the proposed development in the Draft Environmental Management Programme (“EMPr”) must be amended to include the information requested in paragraph 1.2. above. • The EMPr must be amended to include method statements for the following activities: <ul style="list-style-type: none"> ➢ Access to the proposed landing site; and ➢ Rehabilitation activities to be undertaken. 	<p>beach access point is used by the municipality and the NSRI to access the beach in emergency situations. The length of the terrestrial cable component from the BMH to the CLS outside Yzerfontein is 4 km in length (Section 5.1 of the FEIAR).</p> <p>The appointed wetland specialist has been in contact with the DHSWS to try and get written confirmation that a Water Use License (WUL) application is not required. As a wetland specialist Mr D Ollis (the appointed specialist) has confirmed that no WUL will be required for the proposed development.</p> <p>Proof of all public participation undertaken is provided in Appendix D of the FEIAR.</p> <p>Please refer to Section 1.2 of the EMPr where this information has been included.</p> <p>A method statement will not be included in the EMPr for access to the proposed landing site as the contractor and staff will use existing access roads to access the site. Access control measures are clearly defined in the EMPr. Access to the beach will be in accordance with the conditions of the ORV permit to be issued to the contractor which will outline permissible beach access points, vehicles to be used and the drivers of such vehicles.</p> <p>Please refer to Annexure 2 of the Final EMPr for the Rehabilitation Plan.</p>

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	<p>2) Directorate: Waste Management – Mr Thorsten Aab (Email address withheld):</p> <ul style="list-style-type: none"> This Directorate is satisfied that all its previous comments were adequately responded to in the Draft EIA Report and does not have any further comments on the application. <p>3) Directorate: Development Facilitation – Mr Ryan Apolles (Email address withheld)</p> <ul style="list-style-type: none"> This Directorate is satisfied that the findings from the various specialist studies concluded that the identified environmental impacts can be mitigated to acceptable levels and that the EMPr provided adequate avoidance and mitigation measures to address potential impacts. <p>4. Directorate: Biodiversity and Coastal Management – Ms Mercia Liddle (Email address withheld)</p> <ul style="list-style-type: none"> The coastal foredune, beach and section of the intertidal zone are classified as an Ecological Support Area (“ESA”). According to the Western Cape Biodiversity Spatial Plan (“WCBSP”) 2017, an ESA is not essential for meeting biodiversity targets, but play an important role in supporting the functioning of Protected Areas or Critical Biodiversity Areas and are often vital for delivering ecosystem services. They support landscape connectivity, encompass the ecological infrastructure from which ecosystem goods and services flow, and strengthen resilience to climate change. ESAs need to be maintained in at least a functional and often natural state, in order to support the purpose for which they were identified, but some limited habitat loss may be acceptable. The increased effects of climate change, sea level rise and increased storm surges in coastal environments obliges the Department to adopt a more cautious approach when considering development along the coast. The coastline of the West Coast is a harsh and highly dynamic environment, where the biophysical attributes of the coastline are in a constant state of flux. Some of this change is cyclical and predictable, taking place over relatively short (seasonal) temporal scales, whilst other 	<p>Thank you for your comment.</p> <p>Thank you for your comment.</p> <p>Your comment is noted and supported.</p> <p>Your comment is noted and supported.</p>

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	<p>change is unseasonable and unpredictable. These unpredictable fluctuations often result in abrupt changes in coastal geomorphology. This paired with the increased effects of climate change, sea level rise and increased storm surges in coastal environments, oblige authorities to adopt a more cautious approach when considering land use applications along the coast.</p> <ul style="list-style-type: none"> <li data-bbox="451 500 1224 1136">• The Department delineated a coastal management line (“CML”) for the West Coast District as one strategy through which responsible coastal management can be promoted, by ensuring that development is regulated in a manner appropriate to risks and sensitivities in the coastal zone. The CML was informed by various layers of information including inter alia, biodiversity, estuarine functionality, risk flooding, and wave run-up modelling and was delineated in conjunction with and supported by other organs of State, including the local and district Municipalities, CapeNature and all other organs of State represented on the steering committee for the West Coast CML Project. The ultimate intention of the coastal management line, as defined in the proposed amendments to the National Environmental Management: Integrated Coastal Management Act, 2008 (Act No. 24 of 2008) (“NEM: ICMA”), is to protect or preserve coastal public property; private property and public safety; the coastal protection zone (“CPZ”), and to preserve the aesthetic value of the coastal zone. The use of a CML is of importance in response to the effects of climate change, as it involves both the quantification of risks and proactive planning for future developments. It is however noted that due to the nature of the proposed activities, its location seaward of the CML is warranted <li data-bbox="451 1177 1224 1421">• The proposed activities will entail the excavation and deposition of more than 5m³ of material within 100m of the high-water mark of the sea when trenching for, and backfilling of, the marine telecommunications cable. The applicant should note that the proposed development will be in the CPZ as defined in section 16 of the NEM: ICMA and fall seaward of the West Coast District CML during the construction phase. The purpose of the CPZ is to avoid increasing the severity of natural hazards in the coastal zone and to protect people and properties from risks arising from 	<p>Your comment is noted, and your support appreciated.</p> <p>Your comment is noted.</p>

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	<p>dynamic coastal processes, including the risk of sea level rise.</p> <ul style="list-style-type: none"> • The landing of the proposed marine telecommunications cable will enter the littoral active zone (“LAZ”) of Yzerfontein Beach, and it is said to have an impact on the coastal dune cordon. The LAZ is defined as “any land forming part of, or adjacent to, the seashore that is: <ul style="list-style-type: none"> ➢ Unstable and dynamic as a result of natural processes; and ➢ 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.” ➢ The LAZ comprises a very dynamic system and should be treated as such to allow for the free movement of sand without any interferences. ➢ The proposed activity is located along a sandy shore that is naturally subjected to cycles of erosion and accretion and it is essential that adequate space or buffers are provided for and maintained to allow for such processes. The proposed activities must therefore not negatively impact the coastal/environmental processes located within the LAZ. • As far as possible, the proposed activities should not hinder the general public’s ability to access the coast. Appropriate signage should be used to inform the public during the installation/excavation phase to ensure public safety. • It is noted that the developer has identified relevant permits for working in the CPZ. The Draft EMPr states that only those vehicles and drivers permitted to access the beach as per the Control of Vehicles in the Coastal Zone Regulations, 2014 can drive on the beach. Access to the beach is only allowed from the access point authorised in the Off-Road Vehicle Permit. The Draft EIA Report has noted that there is existing infrastructure for parking near the proposed landing site which is further highlighted in the West Coast Coastal Access Audit. The Draft EIA Report notes that the developer must have several permits before undertaking the development, such as a Lease Permit from CapeNature 	<p>The EAP and project proponent are aware of the sensitive and highly dynamic nature of the coastal environment and have planned the project accordingly to ensure infrastructure is protected and not exposed through erosion and accretion cycles. Every effort will be made to minimise the construction footprint and duration of construction within this environment.</p> <p>As per the section 6.1.1 of the EMPr access for the public will be suitably demarcated and signage will be erected to ensure public safety.</p> <p>The EAP and project proponent are aware of the required permits to be obtained prior to construction commencing.</p>

Name and Organisation	Comment	Response
	<p>in terms of the Seashore Act, 1935 (Act No. 21 of 1935) as well as consent or agreement from Department of Public Works to construct infrastructure in state land located above the high-water mark of the sea.</p> <ul style="list-style-type: none"> • It is noted that the developer has identified several measures to prevent and manage waste disposal along the coast. The Draft EIA Report highlighted that during the installation phase, construction workers will be encouraged to practice good housekeeping to limit negative visual impacts and leave the site clean and free of waste of any kind. Excess excavation material and construction rubble must be disposed at a licensed waste disposal facility if it is not being repurposed. Temporary waste bins and skips must be located so that they are easily accessible for emptying and removal as specified in the EMPr. • Taking NEM: ICMA into account, the Directorate has no objection to the preferred landing site alternative (Alternative 1) as it makes use of existing West Africa Cable System infrastructure on land and avoids the shell midden/s, thus minimising environmental impacts. The mitigation measures as specified in the Draft EMPr dated May 2021, relating to the coastal dune cordon north of the proposed landing site, is supported. The monitoring of rehabilitation for a period of 6 months after the completion of remedial works is also supported. It is recommended that a copy of the monitoring report be submitted to this Directorate for information purposes. <p>5) Directorate: Pollution and Chemicals Management – Mr Gunther Frantz (Email address withheld):</p> <ul style="list-style-type: none"> • The excavation and trenching activities for the shore-crossing of the subsea cable must be strictly controlled and monitored by an environmental control officer to prevent any unnecessary disturbance to sensitive shore environments. • No refuelling, handling of hydrocarbon products or maintenance of heavy earth-moving vehicles during excavation operations, is to take place within the beach area. All vehicle maintenance or refuelling must be 	<p>Thank you for your support of the conditions included in the EMPr.</p> <p>Thank you for your support of the preferred landing site (Alternative 1) and proposed mitigation measures and monitoring to be undertaken. A monitoring report will be submitted to your department once construction has been completed and the site rehabilitated.</p> <p>An external independent Environmental Control Officer (ECO) will be appointed for the duration of the construction and rehabilitation period by the project proponent.</p> <p>As per the EMPr no refuelling or handling of fuels will take place within the beach environment.</p>

Name and Organisation	Comment	Response
	<p>done outside of the beach area, to minimise the risk of hydrocarbon contamination within this sensitive area.</p> <ul style="list-style-type: none"> • The storage of hazardous substances (i.e., diesel, petrol, and lubricants, etc.) must be located on impervious surfaces with bunds (to accommodate 110% of the maximum allowable volume) around them to contain any fugitive spillages and/or leakages. • No discharge of effluents or the wash water from cement batching areas should be allowed to be discharged to the beach environment. Runoff must be strictly controlled in the vicinity of any cement batching areas. • Please amend the contact details of the Department's official for the reporting of section 30 incidents in terms of the National Environmental Management Act, 1998 (Act No. 107 of 1998) ("NEMA") (section 6.6.5, page 37 of the EMPr) to Mr Simon Botha (e-mail: Simon.Botha@westerncape.gov.za and telephone: (021) 483 0752). <p>6) The applicant is reminded of its "duty of care" prescribed in section 28 of the NEMA which states that "Every person who causes, has caused or may cause significant pollution or degradation of the environment must take reasonable measures to prevent such pollution or degradation from occurring, continuing or recurring, or, in so far as such harm to the environment is authorised by law or cannot reasonably be avoided or stopped, to minimise and rectify such pollution or degradation of the environment", read together with section 58 of the NEM: ICMA, 2008 which refers to one's duty to avoid causing adverse effects on the coastal environment.</p> <p>7) Please direct any enquiries via e-mail to the official/s indicated in this correspondence should you require any clarity on any of the comments provided.</p> <p>8) The Department reserves the right to revise initial comments and request further information based on any information received.</p>	<p>Thank you for your comment this condition has been included in the EMPr.</p> <p>No cement batching plants will be required for this development.</p> <p>Thank you, the details have been updated in the EMPr accordingly as requested.</p> <p>The EAP is aware of the duty of care towards the coastal environment and will make every effort to ensure no adverse effects on the coastal environment takes place.</p> <p>Thank you for the comments received and support for the proposed development.</p> <p>Your comment is noted.</p>

<p>Date: 30.062021 E Mail: Ben Tromp Yzerfontein Conservancy</p>	<p>With reference to the proposed project (below) and relevant DEIAR, the following comment :</p> <p>On behalf of Yzerfontein Urban Conservancy I would like to support your project and also the Option 1 for the routing of the cable onshore via existing manhole facilities, without disturbing any of the dunes and stabilising vegetation on and adjacent to the dunes. A lot of time and effort has gone into the rehabilitation and stabilisation of the dune area next to the main beach at Yzerfontein and we would like to encourage you not to disturb the existing dune system.</p> <p>Thank you for your consideration in this regard,</p>	<p>Thank you for your comments received and support for the proposed development. The dune vegetation will be designated as a no-go area and no disturbance to this area will take place.</p>
<p>Date: 7 July 2021 Nelisa Ndobeni DHSWS: Control Environmental Officer</p>	<p>DRAFT ENVIRONMENTAL IMPACT ASSESSMENT REPORT- ALCATEL SUBMARINE NETWORKS (ASN) 2AFRICA (WEST) SUBMARINE FIBRE OPTIC CABLE SYSTEM TO BE LANDED AT YZERFONTEIN, WEST COAST DISTRICT, WESTERN CAPE, SOUTH AFRICA</p> <p>Reference is made to the above-mentioned document dated May 2021 with EIA Reference Number: 14/12/16/3/3/2/2047. The Department provided comments on the Draft Scoping Report dated 19 February 2021 and the Final Scoping Report dated 23 March 2021. Please note that these comments are still valid. Please do not hesitate to contact the above office should there be any queries.</p>	<p>Thank you for your comments received.</p>

<p>Date 29.06.2021: E Mail Phumla Ngesi PASA - Env Compliance Manager</p>	<p>COMMENTS ON DRAFT ENVIRONMENTAL IMPACT ASSESSMENT REPORT (DEIAR) FOR THE PROPOSED 2AFRICA/GERA (EAST) SUBMARINE FIBRE OPTIC CABLE SYSTEM TO BE LANDED AT DUYNEFONTEIN, CITY OF CAPE TOWN, WESTERN CAPE, SOUTH AFRICA</p> <p>The Petroleum Agency SA (hereafter referred to as "the Agency") has reviewed the DEIAR and would like to provide the following comments:</p> <p>1. Implication of permanent exclusion zones on oil and gas industry:</p> <p>It is noted that a permanent exclusion zone of 500m on either side of the proposed cable will apply on oil and gas activities. Please be advised that oil and gas industry is still at an infancy stage with a number of exploration rights areas undergoing early phase exploration to identify areas with prospects and leads. Permanent exclusion zones will impact the oil and gas industry negatively as follows:</p> <ul style="list-style-type: none"> ▪ The opportunity to explore excluded areas will be lost as the seabed will be unavailable permanently, meaning that even if the said areas have significant oil and gas resources, there will be never a chance to discover them, unless other activities such as geophysical surveys and directional drilling is permitted. ▪ Holders' exploration plans will be extensively impacted as it is impossible to undertake discontinuous geophysical surveys over a particular area as this creates gaps in data collected. ▪ Holders of exploration rights have the exclusive right to undertake activities over the exploration right areas and such exclusion zones will infringe on their right explore on these areas. <p>2. Yzerfontein cable landing area and affected right holder:</p>	<p>Please note that reference to the 500 m exclusion zone in relation to oil and gas activities has been removed from the EIA report. The EAP believes that the commercial and operational objectives of protecting the cable infrastructure can be achieved while at the same time protecting the exploration rights of offshore concession holders by obtaining legal consent from the concession holders and drawing up co-operation agreements where activities of both parties can co-exist without limiting each other's commercial operations.</p> <p>To effectively plan cable routes, armouring and burial and prevent cable system damage on the seabed (from Oil and Gas activities), the Applicant (MTN) undertakes to proactively inform offshore concession holders of its concept designs (for cable laying and routing) and to collaboratively plan on an ongoing basis its detailed installation designs and operational procedures with the concession holders. Given the small footprint of the cable it is unlikely that the proposed cable route will have any impact on the opportunity to explore the seabed for oil and gas deposits</p> <p>Additionally, to eliminate interactions with future oil and gas activities on cable system infrastructure the applicant will work with the offshore concession holders to map the marine cable system route and formally Register the cable routing as a real right against the Deed and against the Oil and Gas</p>
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