

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

DRAFT SCOPING REPORT PERIOD (15 JANUARY 2021 – 15 FEBRUARY 2021)

COMMENTS AND RESPONSE REPORT

Name	Organisation
Dr Hayley Cawthra	Chief Scientist - marine geology - Council for Geoscience
Department of Environment, Forestry & Fisheries – Ocean & Coasts	Department of Environment, Forestry & Fisheries – Ocean & Coasts
Department of Water and Sanitation – Central Point	Department of Water and Sanitation – Central Point
Ms Waseefa Dhansay	Heritage Western Cape – Resource Management Services
Ms Sindiswa Dlomo	Department of Environment, Forestry & Fisheries – Integrated Environmental Authorisations
Ms Sharon February	Cape West Coast Biosphere - Chairman
Mr Gerhard Gerber	Department of Environmental Affairs & Development Planning – Western Cape – Head of Department
Mr John Gribble	Aco-Associates
Mr Martin Halvorsen	I&AP
Ms Philippa Huntly	CapeNature - Mainstream Specialist Biodiversity Intelligence
Mr Maxhoba-ayakhawuleza Jezile	DEFF – Fisheries Management, Directorate: Sustainable Aquaculture Management
Mr Steve Kirkman	Department of Environment, Forestry & Fisheries – Ocean & Coasts
Ms Doretha Kotze	West Coast District Municipality – Town and Regional Planner
Ms Adri La Meyer	Department of Environmental Affairs & Development Planning – Western Cape
Mr Ashwin Lewis	Darling Black Business Forum
Mr Ephron Maradwa	Department of Environment, Forestry & Fisheries – Integrated Environmental Authorisations
Dr Duncan Miller	Affiliated Professor - Department of Geology, University of the Free State
Ms Nelisa Ndobeni	Department of Water and Sanitation – Western Cape
Mr Ben Tromp	Yzerfontein Conservancy - Chairperson
Yumna van der Schyff	University of Cape Town
Mr Marius Wheeler	CapeNature
Ms Briege Williams	South African Heritage Resources Agency – Heritage Officer

Name and Organisation	Comment	Response
<p>Date: 22 12 2020 (Email) Ms Waseefa Dhansay Heritage Western Cape Resource Management Services</p>	<p>There will be no S38(1) trigger and no NID required as the cables affecting HWC's jurisdiction would be less than 100m.</p> <p>The standard archeological approach will apply nonetheless – if any heritage resources are uncovered work is to stop and HWC to be informed.</p>	<p>I'm doing impact assessments for two submarine telecoms (fibre) cables that will be landed on the west coast - one at Duynefontein and the other at Yzerfontein.</p> <p>SAHRA has requested HIA's for the offshore component (i.e. below the high-water mark) of each cable route and these are underway.</p> <p>I need to check with you both about the NIDs for the terrestrial portions of both cables will be required.</p> <p>At Duynefontein the cable will land at the existing ACE Cable landing point where a number of other cable systems already come ashore (SAT2, SAT3, ACE and the future Equiano cable system), and at Yzerfontein landfall will be at the existing submarine cable WACS landing point, where again a number of existing cable make landfall.</p> <p>In both instances once they have crossed the beach and high/low water boundary the cables will be routed to existing Beach Manholes (BMH) and from there each will routed in an existing buried cable sleeves to their respective Cable Landing Stations (CLS) which are the control centres for the cable systems and where they connect to the domestic telecoms network. No disturbance to the terrestrial environment will thus occur between the BMH and CLS in either case.</p> <p>Where there <u>will</u> be disturbance to the ground between the high water mark and the BMHs, the documentation I have for both projects indicates that the total length of new terrestrial cabling will be approximately 100 m in the case of Yzerfontein and approximately 250 m or 200 m (depending on which BMH option is used) at Duynefontein. In both cases, therefore, less than the 300 m required to trigger a NID.</p> <p>Could you please confirm for me that a NID application is thus <u>not</u> required for either of these two projects?</p> <p>I have attached a copy of the BIDs for both projects for your information.</p>

Name and Organisation	Comment	Response
		<p>Many thanks for your speedy reply. Much appreciated.</p> <p>All understood and we will make sure that the client is aware that should anything be found during the landing of the cable; work will be stopped and HWC will be notified.</p>
<p>Date: 14 01 2021 (Email) Department of Environment, Forestry & Fisheries - Ocean & Coasts</p>		<p>This email serves to inform your Department that the Draft Scoping Report for the above-mentioned project is available on ACER's website: www.acerafrica.co.za under the link "Projects -Current Public Review" - (2AFRICA (West) - Yzerfontein). The report is also available for download at the following link: https://www.dropbox.com/sh/sf64bf3ikmukgn3/AAC5eS7FS3-fH6e_sJXAH46va?dl=0Yzerfontein. https://drive.google.com/drive/folders/1leXJuVFtnlehRw1UZ26UJv5hFSvYpAPq?usp=sharingYzerfontein.</p> <p>The DSR notification mail merge will however be sent out to all I&APs on Friday, 15 January 2021.</p>
<p>Date: 15 01 2021 (Email) Ms Philippa Huntly CapeNature - Mainstream Specialist Biodiversity Intelligence</p>	<p>Information for EAPs regarding receiving comment from CapeNature on development applications</p> <p>Just so you know we have restructured and here below is information for your reference in terms of where to direct requests for comment from CapeNature for new applications:</p> <p>Stellenbosch, Drakenstein, Witzenberg, Breede Valley, Overberg (west of the R43) and Theewaterskloof (west of the R43) – Alana Duffell-Canham. This area is known as Central Landscape in CapeNature. Alana Duffell-Canham <aduffell-canham@capenature.co.za></p> <p>West Coast all municipalities and City of Cape Town – Marius Wheeler (mwheeler@capenature.co.za). This area is known as West Landscape in CapeNature.</p> <p>Overberg (east of the R43), Theewaterskloof (east of the R43), Langeberg and Hessequa – Vicki Hudson (vhudson@capenature.co.za). This area is known as South Landscape.</p>	<p>Thank you for your email and information received.</p>

Name and Organisation	Comment	Response
	<p>All Karoo municipalities, Garden Route (except for Hessequa) – Colin Fordham (cfordham@capenature.co.za).</p> <p>This area is known as East Landscape.</p> <p>Please remove me from the mailing database.</p>	<p>ACER has removed you from the database.</p>
<p>Date: 15 01 2021 (Email) Yumna van der Schyff University of Cape Town</p>	<p>Thank you for your email. Kindly redirect your email to Prof Alison's personal assistant, Ms Scheepers: mel.scheepers@uct.ac.za</p>	<p>Thank you for your email. We will forward Ms Scheepers all the information.</p>
<p>Date: 18 01 2021 (Email) Mr Marius Wheeler CapeNature</p>	<p>Thanks very much. We won't comment further on the scoping as all our comments have been submitted previously.</p>	<p>Thank you for your email and acknowledgement.</p>
<p>Date: 18 01 2021 (Email) Ms Briega Williams South African Heritage Resources Agency Heritage Officer</p>	<p>Please can you upload the DSR onto SAHRIS under the case file for this project.</p> <p>Thanks for your email, I saw that you were working on the cases so thanks for letting me know that one has been uploaded.</p>	<p>ACER has uploaded the DSR to SAHRIS.</p>
<p>Date: 18 01 2021 (Email) Mr Ashwin Lewis Darling Black Business Forum</p>	<p>Thank you for the update.</p>	<p>Thank you for your acknowledgement email.</p>
<p>Date: 18 01 2021 (Email) Department of Water and Sanitation – Central Point</p>	<p>This is to acknowledge receipt of your office correspondence which has been sent to the relevant office for action.</p>	<p>Thank you for your acknowledgement email.</p>
<p>Date: 19 01 2021 (Email) Department of Environment, Forestry & Fisheries - Ocean & Coasts</p>	<p>Kindly note that we are encountering an error while downloading the PDF documents for this project. Also ensure that the version is PDF that can used offline without requiring an internet connection.</p> <p>Kindly drop all documents in this drive link (https://environmentza-my.sharepoint.com/:f/g/personal/fditinti_environment_gov_za/EoJT0sLrxCNAiMSBmqO54j0BGSbouGrNtLSP_Td4pVzITQ?e=noOkYn) for our review.</p> <p>Kindly remove all officials in your database representing DEFF, and all future correspondence and documentation, Enquiries, Meetings and site inspection requests related to EIA applications (hard copy and an electronic copy) must be submitted to our office or via OCeia@environment.gov.za / or Physical Address: Department of Environment Affairs (DEA), Branch: Oceans and</p>	<p>The Draft Scoping Report documents for the proposed Marine Telecommunications Cable Systems 2AFRICA (West) and 2AFRICA/GERA (East) to be landed at Yzerfontein and Duynefontein are now available on your drive link for your review. Please advise if you have received the documents.</p> <p>ACER will remove all officials from the project database as requested.</p>

Name and Organisation	Comment	Response
	<p>Coast, 2 East Pier Building, East Pier Road, Victoria and Alfred Waterfront, Cape Town, 8001.</p> <p>29 01 2021 (Email) Yes, we received the documents.</p>	<p>26 01 2021 (Email) Please advise if you received my email below and if you have received the documents.</p> <p>Thank you for your acknowledgement of receiving the DSR documents for the Duynefontein and Yzerfontein projects.</p>
<p>Date: 20 01 2021 (Email) Mr Ephron Maradwa Department of Environment, Forestry & Fisheries Integrated Environmental Authorisations</p>	<p>14/12/16/3/3/2/2047</p> <p>ACKNOWLEDGEMENT OF RECEIPT OF THE NEW APPLICATION AND DRAFT SCOPING REPORT FOR ENVIRONMENTAL AUTHORISATION FOLLOWING A SCOPING ASSESSMENT PROCESS 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 Application form and draft Scoping Report for Environmental Authorisation for the abovementioned project on 15 January 2021. You have submitted these documents to comply with the Environmental Impact Assessment (EIA) Regulations, 2014, as amended.</p> <p>Kindly note that your application for Environmental Authorisation falls within the ambit of an application applied for in terms of Part 3 of Chapter 4 of the EIA Regulations, 2014, as amended. You are therefore referred to Regulation 21 of the 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 Interested & Affected Parties, including the Competent Authority, may be provided with an opportunity to comment on reports and plans contemplated in Regulation 40(1) of the EIA Regulations, 2014, as amended, prior to the submission of an application but must be provided an opportunity to comment on such reports once an application has been submitted to the Competent Authority.</p>	<p>Thank you for the acknowledgement of receipt of the application and DSR.</p> <p>Thank you and we have referred to regulation 21 of the EIA regulations and are aware of the conditions.</p> <p>The authority and other commenting authorities and I&APs have been afforded a chance to comment on the application and Draft Scoping Report.</p>

Name and Organisation	Comment	Response
	<p>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 time-frames prescribed in terms of these Regulations, unless an extension has been granted by the Department 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>Kindly quote the abovementioned reference number in any future correspondence in respect of the application.</p>	<p>This condition is noted, and ACER will strive to meet the required timeframes.</p> <p>No activities will commence prior to receiving environmental authorisation.</p> <p>All future correspondence and reports will include the above-mentioned reference number.</p>
<p>Date: 21 01 2021 (Email) Ms Briega Williams South African Heritage Resources Agency Heritage Officer</p>	<p>CaseID: 15812</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 for submitting the Draft Scoping Report (DSR) 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 DSR 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</p>	<p>Thank you for the Yzerfontein comments received. The contents are noted and will make sure your requirements are met in the HIAs which are currently being produced.</p> <p>The EAP is aware of this and SAHRA will be consulted to get the required permits if required.</p>

Name and Organisation	Comment	Response
	<p>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. 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.</p> <p>On page vii under the section Details of the Public Participation Process, SAHRA must be listed as a key stakeholder.</p> <p>Section 8.6 indicates that survey data for the alignment of the subsea cable will be provided to the heritage specialist for review, this is supported by SAHRA as it is an important aid to inform the specialist report.</p> <p>On Page 15 under Section 3.1.5 the last sentence of the last paragraph reads <i>“It must be noted that SAHRA is the relevant heritage authority for all heritage resources located under the low water mark of the sea up to a distance of 24 Nautical miles seaward from the high-water mark of the sea.”</i> This sentence is somewhat confusing and should read <i>“SAHRA is the relevant heritage authority for all heritage resources located below the high-water mark of the sea up to a distance of 24 Nautical miles seaward.”</i></p> <p>The applicant is advised that a comment on possible terrestrial heritage impacts from the relevant Provincial Heritage Resources Authority (PHRA) must be obtained in addition to this comment.</p>	<p>The Heritage Specialist will be asked to undertake a maritime assessment of the area.</p> <p>A qualified maritime archaeologist will be appointed to assess the potential impacts on maritime heritage resources.</p> <p>SAHRA has been added as a key stakeholder.</p> <p>Thank you for your comment the survey report will be made available to the appointed heritage specialist.</p> <p>This has been amended as requested.</p> <p>Comment from the Provincial Heritage Resources Authority (PHRA) will be obtained once the heritage assessment has been completed.</p>

Name and Organisation	Comment	Response
	<p>All correspondence and reports relating to this project must be uploaded to the South African Heritage Resources Information System (SAHRIS) to provide SAHRA with the opportunity to comment. SAHRA does not accept hard copy documents, links to documents, or documents received via post.</p> <p>Should you have any further queries, please contact the designated official using the case number quoted above in the case header.</p> <p>Terms & Conditions:</p> <ol style="list-style-type: none"> 1. This approval does not exonerate the applicant from obtaining local authority approval or any other necessary approval for proposed work. 2. If any heritage resources, including graves or human remains, are encountered they must be reported to SAHRA immediately. 3. SAHRA reserves the right to request additional information as required. 	<p>All documents will be uploaded to the SAHRIS system as requested.</p>
<p>Date: 25 01 2021 (Email) Mr Martin Halvorsen – I&AP</p>	<p>Please register me as an IAAP. Martin Halvorsen martin@ysie.co.za</p> <p>I am also ECO at the WACS Telkom site and was involved from the landing of WACS cable to date. I have the local knowledge and is from here.</p>	<p>Thank you for your email. ACER will register you on the project database.</p>
<p>Date: 03 02 2021 (Email) Ms Adri La Meyer Department of Environmental Affairs & Development Planning Western Cape</p>	<p>Many thanks for the reminder. Due to a hectic workload, I will only be able to submit comments on the deadline of the 15th, as I have 6 x comments on DSR's due for the 15th.</p>	<p>Thank you for your email and will await your comments.</p>
<p>Date: 03 02 2021 (Email) Dr Duncan Miller Affiliated Professor Department of Geology University of the Free State</p>	<p>I have read the 2AFRICA.Yzerfontein draft scoping report with interest, and also forwarded it to my research collaborators, including Dr Hayley Cawthra of the Council for Geoscience (CGS).</p> <p>My only comment is that if the alternative cable route through the sand dunes to the caravan park is followed, I would like to be invited to inspect any excavation through the dune cordon and be allowed to take sand samples for geodating purposes. This would be included in our ongoing academic research into the age, formation and mode of erosion of the Yzerfontein dune cordon.</p>	<p>Thank you for your comment. The preferred alternative is to have the cable landing tie into the existing WACS infrastructure that has been installed on the beach and then connect to the existing WACS BMH. It is unlikely that the Alternative 2 alignment that passes through the dune cordon will be selected. Should this alignment be utilised however we will invite you to take samples for geodating.</p>
<p>Date: 04 02 2021 (Email) Department of Environment, Forestry & Fisheries</p>	<p>Kindly remove all officials in your database representing DEFF, and all future correspondence and documentation, Enquiries, Meetings and site inspection requests related to EIA applications (hard copy and an electronic copy) must be</p>	<p>Thank you for your email. All officials will be deleted from the mailing database as requested.</p>

Name and Organisation	Comment	Response
Ocean & Coasts	submitted to our office or 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.	
Date: 08 02 2021 (Email) Mr Ben Tromp – Yzerfontein Conservancy - Chairperson	<p>Could you kindly register us, Yzerfontein Conservancy as an interested and affected party, referring to the attached DSR comment sheet. Your confirmation of receipt and registration will be appreciated.</p> <p>Comments:</p> <ul style="list-style-type: none"> • Impact on current flow along coastline • Impact on natural Vegetation & Fauna • Impact on dune structures • Winter storm damage potential • Would like to comment once we have received the DSR and relevant information 	<p>Thank you for your email and comments received. Yzerfontein Conservancy is now registered on the database as an interested and affected party.</p> <p>We will ensure that the Yzerfontein Conservancy is registered on the project database and you will be sent notifications of all future reports available for review and comment.</p>
Date: 08 02 2021 (Email) Mr Maxhoba-ayakhawuleza Jezile Department of Environment, Forestry & Fisheries (Fisheries Management Directorate: Sustainable Aquaculture Management)	<p>Please find the attached document, DEFF: Fisheries Management, Directorate Sustainable Aquaculture Management's comment on the draft scoping reports.</p> <p>Comments:</p> <p>Department of Environment, Forestry and Fisheries, Branch Fisheries Management, Directorate Sustainable Aquaculture Management has reviewed the draft Scoping Report for the Proposed Marine Telecommunications Cable System 2AFRICA (West) Cable System to be landed at Yzerfontein and Duynefontein, Western Cape, South Africa. The coordinates provided in the draft Scoping Report indicate that the landing sites fall within the Western Cape Aquaculture Abalone ranching area (WC3a -34 23 58 68; 19 07 27 22, WC b -32 25 12 00; 19 10 49 17). Consideration should be made for impact when the cable is being laid going to the landing sites. Impacts that are likely to happen are, the cable might be intersecting the ranching area and disruption of the abalone and its habited, related the construction impacts for future or existing seeded areas on the ranching operation. Please note that there are no ranching operations or seeding in the Western Cape Aquaculture Abalone Ranching site at the moment but there has been interest shown by potential investors.</p>	<p>Thank you for your email and comments received.</p> <p>Please could you provide ACER with KMLs for the proposed Western Cape Aquaculture Abalone ranching area (WC3a -34 23 58 68; 19 07 27 22, WC b -32 25 12 00; 19 10 49 17) so that ACER can plot these areas on Google Earth in relation to the cable alignment.</p>
Date: 08 02 2021 (Email) Dr Hayley Cawthra	Following on from Dr Miller's request, part of this research project considers the geology and morphology of the continental shelf seafloor adjacent to the present	Thank you for your email. ACER will request if this information can be shared with you.

Name and Organisation	Comment	Response
<p>Chief Scientist - marine geology - Council for Geoscience</p>	<p>coast. We will be carrying out 'boomer' medium-penetration sub-bottom profiling in the Yzerfontein Bay in the next 2-3 months towards drawing links between this land-sea connection. If at all possible, may we request access to marine geophysical / hydrographic data (outlined on pg. 53 in the scoping report) that may be collected for the cable route survey once an appropriate embargo no longer applies, for academic purposes?</p> <p>I am also more than happy to assist with marine geological interpretation if needed.</p>	
<p>Date: 10 02 2021 (Email) Department of Environment, Forestry & Fisheries Ocean & Coasts</p>	<p>COMMENTS ON THE DRAFT SCOPING REPORT FOR THE PROPOSED 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>The Oceans & Coasts (O&C) Branch of the Department of Environment Forestry and Fisheries (DEFF) has reviewed the Draft Scoping Report for the proposed Alcatel Submarine Networks (ASN 2africa (West) Submarine Fibre Optic Cable System to be Landed at Yzerfontein, West Coast District, Western Cape, South Africa in the Western Cape 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 Branch O&C has a mandate to protect the ecological integrity, natural character and the economic, social and aesthetic value of the coastal zone; as well as to protect people, property and economic activities from risks arising from dynamic coastal processes. It further ensures that the use of natural resources in the coastal zone and development associated with the coastal zone is socially and economically justifiable and ecologically sustainable. The EAP is reminded that comments and recommendations as provided below are intended to ensure the achievement of the aims and objectives of the ICM Act and guarantees that the coastal environment will be protected and conserved throughout all phases. 	<p>Thank you for your email and comments received.</p> <p>The EAP is aware of the O&C mandate and has proactively engaged with the department during the EIA process. The EAP is aware that the comment made below are intended to achieve the objectives of the ICM Act and the EAP has endeavoured to assesses and items raised.</p>

Name and Organisation	Comment	Response
	<p>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>2. <u>Section 63 of the ICM Act: Environmental authorisations for coastal activities</u> (2.1) Considering what the CA must take into account in terms of Section 63 of the ICM Act that 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. Additionally, the CA must take into account the following but not limited to: proposed project associated operational and maintenance activities; and potential Impacts on purpose and objective of CPP, Coastal Protection Zone, Economic Exclusive Zone, the littoral active zone, adjacent existing structure, functions of marine ecosystems, setback and management lines.</p> <p>3. <u>Off Road Vehicle (ORV)</u> (3.1) To ensure that driving within the coastal zone is carried out in an environmental 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&C contact details to obtain an ORV permit ORVPermitting@environment.gov.za.</p> <p>We have provided the following Mitigation Measure to be included in the EMPr:</p> <ul style="list-style-type: none"> To ensure that pollution of the marine ecosystem and seawater contamination is minimized, we recommend that only work necessary must be undertaken within coastal zone. Additionally, no camping site should be planned and established within the CPP No construction activities with potential to affect the general public to 	<p>Your comment is supported and the EMPr will include measures to protect and reduce potential impacts on the Coastal Protection Zone, Economic Exclusive Zone, the littoral active zone, adjacent existing structure, functions of marine ecosystems and setback and management lines.</p> <p>This permit will be applied for once Environmental Authorisation has been issued for the proposed development.</p> <p>This will be included in the EMPr as per your suggestion.</p> <p>This will be included in the EMPr as per your suggestion.</p>

Name and Organisation	Comment	Response
	<p>enjoy the coast should be scheduled and take place during peak season.</p> <ul style="list-style-type: none"> • Construction period to be scheduled avoiding heavy rain and stormy season. Historical data must be used for best time period allocation. • We recommend that cable landing route 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. • Construction should be scheduled to avoid any identified local species breeding and migration routes and season, ships/vessels routes, and where active fishing activities is dominant. Historical data must be used to identify breeding areas, routes and migration seasons that has potential of being affected. • Clearing of vegetation for cable landing purpose should be scheduled where its 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. • Vehicles and machinery have 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, we recommend that no vehicles and machinery should be scheduled to be refuelled within the coastal zone. • Due to the demand for public safety, failure by the responsible contractor 	<p>This will be undertaken if possible, as once the cable is brought to shore the cable must be anchored on shore and secured in the BMH. It is unlikely that this will take place during stormy conditions as sea conditions would not allow a safe cable landing.</p> <p>The proposed landing point has been selected to minimise impacts on the environment and to make use of the existing WACS Cable System infrastructure already installed on land. Similarly, the offshore alignment has been selected to follow closely existing telecommunication alignments landing at Yzerfontein to reduce impacts on seabed users and to avoid rocky substrates which are known to be more ecologically sensitive areas.</p> <p>The proposed construction period will have to be scheduled to coincide with the overall project programme out as vessels installing the cable are working in different areas around Africa installing the cable. Migration patterns, ship/vessel routes and the fishing sector will however be taken into account during the assessment phase of the EIA process.</p> <p>This condition will however be included in the EMPr. The proposed landing of the cable at the preferred landing alternative will not require the removal of any indigenous vegetation as the cable will tie into the WACS anchor block on the beach. This condition will however be included in the EMPr</p> <p>No vehicles will be permitted to be refuelled within the coastal zone and all vehicles must be in good working order. This condition will be included in the EMPr.</p> <p>This will be included in the EMPr.</p>

Name and Organisation	Comment	Response
	<p>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 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”.</p> <ul style="list-style-type: none"> • We recommend for the appointment of the Control Environmental Officer (CEO) who will ensure that identified mitigation measures and recommendations are taken into account, 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 for dealing with spills and leaks. • List of Specialist / Assessment required/supported by us include but not limited to: <ul style="list-style-type: none"> ○ Fisheries Specialist Study ○ Marine Vegetation and Ecological Specialist Study ○ Beach and Coastal Dune Specialist Study ○ Coastal Processes and Climate Change Impact Assessment ○ Major Hazardous Installation Assessment 	<p>An Environmental Control Officer (ECO) will be appointed to ensure the conditions of the EMP, and EA are implemented on site.</p> <p>A fisheries assessment will be commissioned.</p> <p>A marine benthic assessment and onshore ecology and vegetation assessment will be commissioned.</p> <p>A beach and coastal dune assessment will be commissioned.</p> <p>The coastal dune assessment will cover issues related to coastal processes and climate change in their assessment and as such a separated assessment will not be commissioned for this Environmental Impact Assessment</p> <p>A major hazardous installation assessment will not be commissioned for this Environmental Impact Assessment as the proposed development</p>

Name and Organisation	Comment	Response
	<ul style="list-style-type: none"> ○ Socio-Economic Impact • Therefore, 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 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; • Kindly note that the activity may not commence prior to 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; • Please be advised that the Sub Directorate: Coastal Development and 	<p>involves the laying of an inert marine telecommunications cable which is not hazardous. In terms of the legislation a "major hazard installation" means an installation (a) where more than the prescribed quantity of any substance is or may be kept, whether permanently or temporarily; or (b) where any substance is produced, processed, used, handled or stored in such a form and quantity that it has the potential to cause a major incident. None of these apply to the proposed development and as such this assessment is not necessary.</p> <p>A socio-economic impact assessment will not be commissioned for this Environmental Impact Assessment as the proposed socio-economic impacts are well known.</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>No construction or installation of the proposed cable system will take place until a positive Environmental Authorisation has been issued for the proposed development.</p> <p>Your comment is noted, and all future correspondence will be addressed</p>

Name and Organisation	Comment	Response
	<p>Protection within the Branch: O&C is responsible for coordinating and facilitate EIA comments and advice for developments within the marine environment. Kindly forward request of EIA Comments to, Email: OCeia@environment.gov.za.</p> <p>For attention of the EAP and CA:</p> <ul style="list-style-type: none"> The applicant must take into account, adhere to and implement the relevant section of the National "ICM Act" applicable to this project. The EAP is requested to confirm that the area where the cable will be landed will not result in negative impact on existing and adjacent ships/vessels route and the fishing industry. The applicant is advised to bear in mind that the coast is dynamic and characterized by natural processes, such as flood, sea level rise, accretion, erosion, and storm sedges influenced by the ongoing climate change experienced in the whole of South Africa. The proposed site location for this project has potential of being affected by all of these natural processes. To ensure that our marine environment that is already vulnerable and sensitive is not exposed to additional strain, the design plan, including technology and methodology to be applied will need to take into account effect of climate change. Therefore, the design plan must pay special attention to the long lifespan of the cable and should requires less maintenance. Furthermore, the EAP is requested to provide a detailed description of the state of the locations where the cable is proposed to be landed. The EAP is requested to provide a detailed documentation with advantages and disadvantages on comparison of the proposed site locations, alternatives, technologies and methodologies proposed for this project. The options presented should take into account the 	<p>to OCeia@environment.gov.za for comment.</p> <p>Your comment is noted and will be addressed in the DEIAR.</p> <p>A fisheries assessment will be undertaken as part of the environmental impact assessment phase. It should be noted however that the proposed alignment has been selected to closely follow existing submarine telecommunications cables thus reducing the impact to the deep-sea trawling industry.</p> <p>The proposed landing site has been selected for the prevailing beach characteristics and seabed conditions in order to reduce environmental impacts and to ensure the longevity of the cable system. The cables are also installed using internationally recognised techniques which ensures the cable is protected from external factors which could impact on the cable and require maintenance. Ideally the cable is laid and then not disturbed again for its lifespan. A detailed description of the environment at the cable landing site will be provided in the DEIAR as requested.</p> <p>The assessment of landing alternatives has been discussed in the scoping reports provided for comment and the best environmental option is Alternative 1. In terms of cable infrastructure there are no</p>

Name and Organisation	Comment	Response
	<p>receiving environment, potential impacts and threat to sustainability of the marine environment and function of natural ecosystems.</p> <ul style="list-style-type: none"> 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 any structures related to this project. <p><u>NB: With all the above-mentioned recommendations and conditions, the Branch: O&C has no objections to the 12.2The Draft Scoping Report for the proposed Alcatel Submarine Networks (ASN 2africa (West) Submarine Fibre Optic Cable System to be Landed at Yzerfontein, West Coast District, Western Cape, South Africa.</u></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.</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>technology alternative or installation methods as all cables are installed as per the ICPC (International Cable Protection Committee) guidelines which is considered to be best practice both from an environmental perspective and in terms of cable protection.</p> <p>This comment is supported by the EAP.</p> <p>Thank you for your comment.</p> <p>Your comments are included in the DEIAR which will be forwarded to the CA for review and decision making.</p> <p>Your comment is noted and the EAP is aware that your comments can be revised.</p>
<p>Date: 15 02 2021 (Email) Ms Doretha Kotze West Coast District Municipality – Town and Regional Planner</p>	<p>Ref: 13/2/12/1/1 I refer to your email below and the Draft Scoping Report for the proposal.</p> <p>The West Coast District Municipality has no objection to the proposal, provided that all necessary legislative requirements be met. In this regard your attention is drawn to the requirements of the Swartland Municipal Land Use Planning Bylaw.</p>	<p>Thank you for your emails and comments received.</p>
<p>Date: 15 02 2021 (Email) Mr Martin Halvorsen I&AP</p>	<p>PROPOSED MARINE TELECOMMUNICATIONS CABLE SYSTEM 2AFRICA (WEST) CABLE SYSTEM TO BE LANDED AT YZERFONTEIN, WESTERN CAPE, SOUTH AFRICA</p>	<p>Thank you for your email, it has just come through now. We are having issues with Eskom and Telkom today, but comments are received and will be included in the Comments and Response Report.</p>

Name and Organisation	Comment	Response
	<p>Good day, the town of Yzerfontein is a registered Urban Conservancy and lies in the Cape West Coast Biosphere Reserve which in turn lies in the Cape Floristic Region mainly occurring in the Western Cape Province of the RSA</p> <p>The following issues will affect the inhabitants of Yzerfontein.</p> <ol style="list-style-type: none"> 1. Landing on the main beach. As I understand it the cable will be entering the existing WACS infrastructure in the manhole close to the Yzerfontein Sport Club. It will then follow the existing system that was installed for WACS in 2012/2013. As such there will be some issues. 2. Traffic and traffic management; contractors to adhere to the regulations of the National road traffic act. When manholes in the different parts of Yzerfontein are used proper traffic management to take place with people that have had some training and please try and employ some local people or from ward 6 which covers both Yzerfontein and Darling. 3. The cable servitude along the R315; when entering manholes care must be taken not to spread the declared invasive plant, <i>Echium plantigeneum</i> which is listed under NEMBA as a category 1b invader. This will depend on the time of year when the installation takes place, growing season basically from June to December. Contractors to be reminded that outside Yzerfontein the habitat is a fire driven system and no fires or smoking should be the norm. 4. Waste management. To take place in accordance with the National Waste Act, the closest facility for hazardous waste in the area is at Vissershok in the City of Cape Town. 5. Beach and dune crossing; except the sea this part of the project is the only area where there will be a physical intrusion on land. Please no hydro-carbon spills i.e., excavators or other machinery to be used on beach to in perfect working order. It would be preferable if cable installation under the dunes is drilled and not trenched. Maybe the area around the existing manhole should be better protected with less traffic over and around it. 	

Name and Organisation	Comment	Response
	<p>6. I personally do not have a problem with another cable landing at Yzerfontein as the current WACS installation is unobtrusive with hardly any visual impacts except night lights which are kept on by security at WACS station, this has an impact on flamingos from the nearby pan which move at night and navigate by using the stars.</p> <p>7. The road to WACS station is a mine road, care must be taken when using it. No parking in the road, big trucks transporting gypsum use this road, care also be taken when entering or leaving this road from and to the R315, as road users tend to disregard speed limits and warning/safety signs.</p>	
<p>Date: 15 02 2021 (Email) Mr Gerhard Gerber Department of Environmental Affairs & Development Planning – Head of Department</p>	<p>The e-mail notification of 28 October 2020 providing a Background Information Document (“BID”) and invitation to participate in the environmental impact assessment (“EIA”) process, the Department’s acknowledgement of receipt of the e-mail notification sent via e-mail on 30 October 2020, the Department’s comment on the BID dated 26 November 2020, and the e-mail notification of 15 January 2021 regarding the availability of the Draft Scoping Report (“DSR”), refer.</p> <p>Find attached consolidated comment from various directorates within the Department on the DSR and Plan of Study for EIA dated January 2021 that was downloaded from the link provided by the environmental assessment practitioner (“EAP”). These comments must be read in conjunction with the Department’s comments on the BID, which is also again attached hereto for ease of reference.</p> <p>Please acknowledge receipt of this e-mail.</p> <p>Comments: DEPARTMENTAL REFERENCES: 16/3/3/6/4/2/1/F5/31/2156/20 (Development Management) 19/2/5/3/F5/31/WL0113/20 (Waste Management) 19/3/2/4/F5/31/DDF061/20 (Pollution and Chemicals Management)</p> <p>COMMENT ON THE DRAFT SCOPING REPORT AND PLAN OF STUDY FOR ENVIRONMENTAL IMPACT ASSESSMENT FOR THE PROPOSED 2AFRICA (WEST) SUBMARINE FIBRE OPTIC CABLE SYSTEM TO BE LANDED AT YZERFONTEIN, WEST COAST OF SOUTH AFRICA,</p>	<p>Thank you, your comments have been, received and will be included in the comments and response report.</p>

Name and Organisation	Comment	Response
	<p>SWARTLAND MUNICIPALITY</p> <p>The e-mail notification of 28 October 2020 providing a Background Information Document (“BID”) and invitation to participate in the environmental impact assessment (“EIA”) process, the Department’s acknowledgement of receipt of the e-mail notification sent via e-mail on 30 October 2020, the Department’s comment on the BID dated 26 November 2020, and the e-mail notification of 15 January 2021 regarding the availability of the Draft Scoping Report (“DSR”), refer.</p> <p>Please find consolidated comment from various directorates within the Department on the DSR and Plan of Study for EIA dated January 2021 that was downloaded from the link provided by the environmental assessment practitioner (“EAP”). These comments must be read in conjunction with the Department’s comments on the BID, attached hereto for ease of reference.</p> <p>1. Directorate: Development Management (Region 1) – Ms Rondine Isaacs (Rondine.Isaacs@westerncape.gov.za):</p> <p>(1.1) A detailed description of the rehabilitation activities to be undertaken must be included in the project description section of the Draft EIA Report and the Draft Environmental Management Programme (“EMPr”). Please ensure that the description relates to the listed activity(ies) that may be triggered.</p> <p>(1.2) The terms of reference for the specialist studies as contained in the Plan of Study for EIA indicates that the specialist studies are required to meet the requirements of Appendix 6 of the National Environmental Management Act, 1998 (Act No. 107 of 1998) (“NEMA”) EIA Regulations, 2014 (as amended). As indicated in this Directorate’s comments on the BID dated 26 November 2020, since the application for environmental authorisation (“EA”) was submitted to the competent authority post 09 May 2020, the EAP must confirm whether any Protocols¹ are applicable to the application. Please note that the Terrestrial Biodiversity and Aquatic Biodiversity Protocols may be applicable to the application as it is noted that an Ecological Assessment will be undertaken.</p>	<p>Rehabilitation measures and mitigation measures to reduce or avoid impacts will be included in the DEIAR and EMPr which will be compiled for this development.</p> <p>Your comment is noted, and your comments have also been sent to the appointed specialists to ensure that their reports meet the requirements of Appendix 6 of the National Environmental Management Act.</p> <p>Given that the proposed cable system is going to feed into the existing cable sleeves installed when the WACS cable system was landed no disturbance to the terrestrial environment is expected inland from the beach. As such it is unlikely that protocols relevant to Terrestrial Biodiversity and Aquatic Biodiversity will be applicable to this development. The appointed specialists will however be required to confirm this.</p>

Name and Organisation	Comment	Response
	<p>(1.3) This Directorate reiterates that where an assessment protocol is prescribed for any of the environmental themes included in the Protocol, the specialist assessment must comply with the Protocol. 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 NEMA EIA Regulations, 2014 (as amended).</p> <p>(1.4) Page 31 of the DSR indicates that <i>“It is likely that a Water Use License (WUL) (General Authorisation) (GA) will be required from the Department of Human Settlements, Water and Sanitation (in terms of the National Water Act, 1998 (Act 36 of 1998) in terms of Regulation GN509 of 26 August 2016, as sections of the project are located within 500 m of wetlands... It is envisaged that the WUL-GA will be issued before the completion of the EIA process.”</i> Please note that in terms of GN No. 509 of 26 August 2016, a Risk Matrix must be completed to determine the type of water use authorisation (i.e., water use licence or a General Authorisation) required in terms of the National Water Act, 1998. The Risk Matrix to be completed by a suitably qualified South African Council for Natural Scientific Professions member must form part of the Wetland Delineation and Functional Assessment.</p> <p>2. Directorate: Waste Management – Mr Thorsten Aab (Thorsten.Aab@westerncape.gov.za):</p> <ul style="list-style-type: none"> This Directorate notes that its comments on the BID have been addressed in the Comments and Response Report (“C&RR”). Where applicable, the comments must be incorporated into the Draft EMPr. This Directorate has no further comment on the DSR and Plan of Study for EIA and awaits the Draft EIA Report for further comment. <p>3. Directorate: Development Facilitation – Ms Adri La Meyer (Adri.LaMeyer@westerncape.gov.za):</p> <p>(3.1) Please update the reference to the Integrated Development</p>	<p>The EAP is aware of this and all specialists have been requested to comply with the protocols if applicable.</p> <p>The appointed Wetland Specialist will establish if a WULA is required and will engage with DHSWS to confirm if a GA or No Trigger letter will apply. Should a GA be required the specialist will complete a Risk Matrix as per the DHSWS requirements.</p> <p>Your comments will be incorporated into the EMPr and DEIAR when these documents are drafted.</p> <p>Thank you for this clarification. The report has been amended</p>

Name and Organisation	Comment	Response
	<p>Plan (“IDP”) for West Coast District Municipality in future documentation. Section 3.2.7 of the DSR notes that the “<i>IDP 2017 - 2018 Review 1 May 2018</i>” was consulted. The correct referencing is the IDP for West Coast District Municipality (2017 – 2022) and the most recent review available of said IDP is that of 2 May 2019.</p> <p>(3.2) Please note that the response to Question 1.1.6 of Table 3 of the DSR regarding an Environmental Management Frameworks (“EMF”) should be amended to indicate that there is no approved EMF for both Swartland and West Coast District Municipalities.</p> <p>4. Directorate: Biodiversity and Coastal Management – Ms Mercia Liddle (Mercia.Liddle@westerncape.gov.za):</p> <ul style="list-style-type: none"> This Directorate notes that its comments on the BID have been addressed in the C&RR and where relevant, incorporated into the DSR. This Directorate awaits the Draft EIA Report with specialist studies for further comment. <p>5. Directorate: Pollution and Chemicals Management – Mr Gunther Frantz (Gunther.Frantz@westerncape.gov.za):</p> <ul style="list-style-type: none"> This Directorate has no comments on the DSR and Plan of Study for EIA. Detailed comments will be provided on the Draft EIA Report. <p>6. 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>7. The Department reserves the right to revise initial comments and request further information based on any information received.</p>	<p>accordingly.</p> <p>Thank you for this clarification. The report has been amended accordingly.</p> <p>Thank you for your comment.</p> <p>Thank you for your comment.</p> <p>Noted with thanks.</p> <p>The EAP will provide any information requested.</p>

Name and Organisation	Comment	Response
<p>Date: 15 02 2021 (Email) Ms Sharon February Cape West Coast Biosphere Chairperson</p>	<p>PROPOSED MARINE TELECOMMUNICATIONS CABLE SYSTEM 2AFRICA (WEST) CABLE SYSTEM TO BE LANDED AT YZERFONTEIN, WESTERN CAPE, SOUTH AFRICA</p> <p>The Cape West Coast Biosphere Reserves is part of more than 710 biospheres around the globe all part of UNESCO's MaB programme.</p> <p>We would like to see that all applicable laws, ordonnances and by-laws are adhered too. If there are any job opportunities available local people should have preference.</p> <p>We would like to see the no fishing area in the Yzerfontein bay enlarged and that the inshore netting fishing adhere to this stipulation. We observe especially in winter that trawlers converge behind the big rock in Yzerfontein Bay. It is been called the "Grootklip"? tor about 200 years but now Google are calling it the "Meeurots" which is wrong. The existing WACS cable comes in from that direction and we assume that the proposed cable will follow the same route.</p> <p>The Cape West Coast Biosphere Reserve welcomes this type of unobtrusive development into our area.</p> <p>If there is any chance of some funds available to communities, we the CWCBR together with the Yzerfontein Urban Conservancy and the Darling Wildflower Society would like to be eligible. The other two organizations together with us do environmental management in our part of the Cape Floristic Region. We are all recognized NPO's, by CapeNature, DEFF and right up to UNESCO. We can issue a section 18 tax certificate if necessary. We are BEE compliant and will be able to disperse funds to other local NPO's.</p> <p>In terms of the South African Bill of rights section 24 all South Africans are entitled to have their environment protected. These NPO's mainly unfunded need money for the noble unpaid work they do. A once off or a monthly contribution will be extremely welcome. There is a lack of environmental capacity at especially the</p>	<p>The applicant will abide by all applicable laws and by-laws both during construction and operation of the proposed cable system. Job opportunities are limited given the specialised skill required to install telecommunications cables and the short construction period. Where local service providers can provide services, these will be sourced locally if available.</p> <p>The proposed 2AFRICA (West) cable will follow the existing cable alignment closely. It must be noted that the enlargement of the no fishing area falls outside of the ambit of this environmental impact assessment, however marine telecommunications are afforded a legislated buffer where no anchoring and trawling is permitted to ensure the cable is protected.</p> <p>Thank you for your comment.</p> <p>Your comment is noted and will be brought to the landing partners attention. The funding of community initiatives falls outside the ambit of this environmental impact assessment process.</p> <p>Your comment is noted and will be brought to the landing partners attention. The funding of NPO's falls outside the ambit of this environmental impact assessment process.</p>

Name and Organisation	Comment	Response
	<p>smaller municipalities.</p> <p>We can be contacted if local knowledge and expertise is required.</p> <p>We wish you the best with your application</p>	<p>Thank you for your offer of assistance.</p> <p>Thank you for your comments and your engagement during the EIA process.</p>
<p>Date: 16 02 2021 (Email) Ms Sindiswa Dlomo Department of Environment, Forestry & Fisheries Integrated Environmental Authorisations</p>	<p>DEFF Reference:14/12/16/3/3/2/2047</p> <p>COMMENTS ON THE DRAFT SCOPING REPORT FOR THE PROPOSED DEVELOPMENT OF THE ALCATEL SUBMARINE NETWORKS (ASN) 2AFRICA (WEST) SUBMARINE FIBRE OPTIC CABLE SYSTEM TO BE LANDED AT YZERFONTEIN, WEST COAST DISTRICT, WESTERN CAPE PROVINCE</p> <p>The Application for Environmental Authorisation and Draft Scoping Report (SR) dated January 2021 and received by the Department on 15 January 2021, refer.</p> <p><u>This letter serves to inform you that the following information must be included to the Final Scoping Report:</u></p> <p>A. <u>Listed Activities</u></p> <ul style="list-style-type: none"> • Please ensure that all relevant listed activities are applied for, are specific and can be linked to the development activity or infrastructure as described in the project description. • If the activities applied for in the application form differ; from those mentioned in the final SR, an amended application form must be submitted. Please note that the Department's application form template has been amended and can be downloaded from the following link https://www.environment.gov.za/documents/forms. <p>B. <u>Layout & Sensitivity Maps</u></p> <p>Please provide a layout map which indicates the following:</p> <ul style="list-style-type: none"> • The proposed Alternative 1 (preferred) and Alternative 2 alignments for the landing of the cable and associated infrastructure for each option; 	<p>The listed activities and what components of the project that trigger them is outlined in the FSR in Table 2.</p> <p>No changes to the listed activities have taken place since submission of the application for authorisation.</p> <p>This map is provided in Appendix 7 Supporting Maps.</p>

Name and Organisation	Comment	Response
	<ul style="list-style-type: none"> • All supporting onsite infrastructure e.g., roads (existing and proposed); • The location of sensitive environmental features on site e.g., CBAs, heritage sites, wetlands, drainage lines etc. that will be affected; • Buffer areas; and • All "no-go" areas. • The above map must be overlain with a sensitivity map and a cumulative map which shows existing cable networks and their associated infrastructure. • Please be advised that Google maps will not be accepted. <p>C. <u>Public Participation Process</u></p> <ul style="list-style-type: none"> • The final SR must provide evidence that identified and relevant competent authorities have been given an opportunity to comment on the proposed development; particularly Swartland Local Municipality, West Coast District Municipality, Western Cape Department of Environmental Affairs and Development Planning (DEADP), Heritage Western Cape, Department of Environment, Forestry and Fisheries - Branch: Oceans and Coasts; Fisheries Management; Biodiversity Conservation, South African Deep-Sea Trawling Industry Association, Offshore concession holders, Department of Mineral Resources, CapeNature. • Please ensure that all issues raised and comments received during the circulation of the SR from registered I&APs and organs of state which have jurisdiction (including this Department's Biodiversity Section) in respect of the proposed activity are adequately addressed in the Final SR. Proof of correspondence with the various stakeholders must be 	<p>This is provided in Appendix 7 Supporting Maps. It must be noted that the preferred alternative will make use of the existing WACS cable infrastructure on land and as such no additional land based cable infrastructure is required.</p> <p>This map is provided in Appendix 7 Supporting Maps.</p> <p>This map is provided in Appendix 7 Supporting Maps.</p> <p>This map is provided in Appendix 7 Supporting Maps.</p> <p>Please refer to Appendix 7 Supporting Maps.</p> <p>Your comment is noted.</p> <p>Please refer to Appendix 2 where all correspondence to competent authorities has been included as well as reminder letters requesting comment. To date most of the authorities mentioned have provided comment.</p> <p>All comment received have been recorded and the FSR updated accordingly where required. All comments received and the EAPs responses are included in Appendix 2 and 3 of the FSR.</p>

Name and Organisation	Comment	Response
	<p>included in the Final SR. Should you be unable to obtain comments, proof should be submitted to the Department of the attempts that were made to obtain comments. The Public Participation Process must be conducted in terms of Regulation 39, 40 41,42,43 & 44 of the EIA Regulations 2014, as amended.</p> <ul style="list-style-type: none"> A comments and response trail report (C&R) must be submitted with the final SR. The C&R report must incorporate all historical comments for this development. The C&R report must be a separate document from the main report and the format must be in the table format which reflects the details of the I&AP and date comments received, actual comments received, and response provided. Please refrain from summarising comments made by I&APs. All comments from I&APs must be copied verbatim and responded to clearly. Please note that a response such as "Noted" is not regarded as an adequate response to I&AP's comments. <p>D. Specialist Assessments</p> <ul style="list-style-type: none"> A detailed description of the study's methodology; an indication of the locations and descriptions of the development footprint, and all other associated infrastructures that they have assessed and are recommending for authorisation. The specialist studies must also provide a detailed description of all limitations to their studies. All specialist studies must be conducted in the right season (where required) and providing that as a limitation, will not be accepted. 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. Should the specialist definition of 'no-go' area differ from the Department's definition, this must be clearly indicated. The specialist must also indicate the 'no-go' area's buffer if applicable. 	<p>This has been done in this Comments and Response Report.</p> <p>The use of noted has been used when the comment received does not require a response from the EAP.</p> <p>The terms of reference for the specialist studies have been included in Section 10 of the FSR.</p> <p>The specialists have been asked to describe the limitations to their studies where relevant.</p> <p>The EAP agrees with this description of a "no-go" area.</p> <p>The EAP will request all specialists to consider a no-go area as an area where no development of any infrastructure is allowed.</p>

Name and Organisation	Comment	Response
-	<ul style="list-style-type: none"> • 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. • Where specialist studies are conducted in-house or by a specialist other than a suitably qualified specialist in the relevant field per the requirements of the protocols, such specialist reports must be peer reviewed by a suitably qualified external specialist in the relevant field. • It is further brought to your attention that the Procedures for the Assessment and Minimum Criteria for Reporting on identified Environmental Themes in terms of Sections 24(5) (a) and (h) and 44 of the National Environmental Management Act, 1998, when applying for Environmental Authorisation (Le. "the Protocols"), which were promulgated in Government Notice No. 320 of 20 March 2020, came into effect on 09 May 2020. Please note that specialist assessments must be conducted in accordance with these protocols, except where the applicant provides proof to the competent authority that the specialist assessment affected by these protocols had been commissioned before 9 May 2020, in which case Appendix 6 of the Environmental impact Assessment Regulations, 2014, as amended, will apply to such applications. <p>E. <u>Cumulative Assessment</u></p> <ul style="list-style-type: none"> • Should there be any other similar projects within a 30km radius of the proposed development site, the cumulative impact assessment for all identified and assessed impacts must be refined to indicate the following: <ul style="list-style-type: none"> ➤ identified cumulative impacts must be clearly defined, and where possible the size of the identified impact must be quantified and indicated. ➤ Detailed process flow and proof must be provided, to indicate how the specialist's recommendations, mitigation measures and conclusions 	<p>This will be undertaken as part of the impact assessment process in order to find the best environmentally feasible option for the proposed development.</p> <p>No Specialist studies have been conducted in-house.</p> <p>Your comment is noted, and your comments have also been sent to the appointed specialists to ensure that their reports meet the requirements of Appendix 6 of the National Environmental Management Act.</p> <p>The assessment will consider cumulative impacts as the project is located within 30 km of the WACS cable system and will share common infrastructure installed for the WACS cable system.</p> <p>This will be undertaken as requested.</p> <p>This will be undertaken as requested.</p>

Name and Organisation	Comment	Response
	<p>from the various similar developments in the area were taken into consideration in the assessment of cumulative impacts and when the conclusion and mitigation measures were drafted for this project.</p> <ul style="list-style-type: none"> ➤ The cumulative impacts significance rating must also inform the need and desirability of the proposed development. ➤ A cumulative impact environmental statement on whether the proposed development must proceed. <p><u>General</u></p> <p>You are further reminded to comply with Regulation 21(1) of the NEMA EIA Regulations 2014, as amended, which states that:</p> <p><i>"If S&EIR must be applied to an application, the applicant must, within 44 days of receipt of the application by the competent authority, submit to the competent authority a scoping report which has been subjected to a public participation process of at least 30 days and which reflects the incorporation of comments received, including any comments of the competent authority"</i></p> <p>You are further reminded that the final SR to be submitted to this Department must comply with all the requirements in terms of the scope of assessment and content of Scoping reports in accordance with Appendix 2 and Regulation 21(1) of the EIA Regulations 2014-, as amended.</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).</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>Agreed.</p> <p>This will be provided in the DEIAR.</p> <p>The EAP is aware of the regulations and the prescribed time periods.</p> <p>No construction will commence until such time as an Environmental Authorisation has been issued by DEFF.</p>
<p>Date: 19 02 2021 (Email) Ms Nelisa Ndobeni</p>	<p>DRAFT SCOPING REPORT - ALCATEL SUBMARINE NETWORKS (ASN) 2AFRICA (WEST) SUBMARINE FIBRE OPTIC CABLE SYSTEM TO BE</p>	<p>Thank you for your email and comments received.</p>

Name and Organisation	Comment	Response
<p>Department of Water and Sanitation – Western Cape</p>	<p>LANDED AT YZERFONTEIN, WEST COAST DISTRICT, WESTERN CAPE, SOUTH AFRICA</p> <p>Reference is made to the above-mentioned document dated January 2021.</p> <p>This Department has perused the above-mentioned document and has the following comments:</p> <ol style="list-style-type: none"> 1. Please note that any development within the 1:100 year flood line or within 500m from any boundary of a wetland or water resource triggers water use activities and must be authorised and registered in terms of Sections 21 (c) “impeding or diverting the flow of water in a watercourse” and (i) “altering the bed, banks, course or characteristics of a watercourse” of the National Water Act, 1998 (Act No. 36 of 1998). 2. A Freshwater Assessment Report (including a Risk Assessment Matrix) must be submitted as part of the Water Use Authorisation Application. 3. Please be advised that no pollution of surface water or groundwater resources may occur due to any activity on the property as such, adequate control measures should be implemented to prevent pollution. 4. Stormwater must be managed on-site and not be allowed to runoff into the natural environment unless it is clean and not polluted. 5. The Applicant, is hereby advised to apply and obtain a Water Use Authorisation as prescribed in Sections 21 (c) and (i) of the National Water Act, 1998 (Act No. 36 of 1998), the application should be submitted online via the Departmental Electronic Water Use License Application and Authorisation System (e-WULAAS) by following the link: http://164.151.129.107/ewulaas/. 6. The comments issued shall not be construed as exempting the developer from compliance with the provisions of any other applicable 	<p>The EAP is aware of this and has commissioned a Wetland Specialist to assess the proposed project area and to identify any wetlands or water resource within 500 m of the proposed landing site. If wetlands or water resources will be impacted a water use license application will be submitted to DHSWS.</p> <p>This will be complied with if wetlands or water resources are identified within the project area.</p> <p>Conditions to prevent water pollution will be included in the EMPr which will be compiled for the proposed development during the impact assessment phase of the EIA process.</p> <p>Measures to control stormwater will be included in the EMPr which will be compiled for the proposed development during the impact assessment phase of the EIA process.</p> <p>If a water use license is required it will be submitted via the online Application and Authorisation System.</p> <p>Your comment is noted and agreed with.</p>

Name and Organisation	Comment	Response
	<p>Act, Ordinance, Regulation or By-law.</p> <p>7. The person who owns, controls, occupies or uses the land in question is responsible for taking measures to prevent any occurrence of pollution to water resources.</p> <p>8. Please note that all requirements as stipulated in the National Water Act, 1998 (Act No. 36 of 1998) must be adhered to.</p> <p>9. Please note that this Department reserves the right to amend and/or add to the comments made above in the light of subsequent information received.</p> <p>Please do not hesitate to contact the above office should there be any queries.</p>	<p>The developer is aware of this and will take measures to prevent pollution on site as per the conditions of the EMPr which will be compiled for the proposed development.</p> <p>The EAP will ensure that the conditions are abided by.</p> <p>The EAP appreciates the comments received and welcomes further comment on the DEAIR.</p> <p>Thank you for your offer of assistance.</p>