

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

FINAL SCOPING REPORT PERIOD

EIA REFERENCE: 14/12/16/3/3/2/2047

COMMENTS AND RESPONSE REPORT

Name	Organisation
Ms Stephanie Barnardt	Heritage Western Cape
Department of Environment, Forestry & Fisheries – Oceans & Coasts	Department of Environment, Forestry & Fisheries – Oceans & Coasts
Mr John Gribble	ACO-Associates cc - Heritage Specialist
Mr Robert Landman	I & J Limited
Ms Nicole Lomborg	Eni/Sasol
Ms Julliet Mahlangu	Department of Environment, Forestry & Fisheries - Integrated Environmental Authorisations
Mr Marius Wheeler	CapeNature
Ms Briege Williams	South African Heritage Resources Agency – Heritage Officer

Name and Organisation	Comment	Response
<p>Date: 25 02 2021 (Email) Department of Environment, Forestry & Fisheries Oceans & Coasts</p>	<p>Thank you, received.</p> <p>04 03 2021 (Email) Comments are due on the 28 March 2021?</p>	<p>Thank you for confirming that the Final Scoping Report was successfully loaded onto your Departments link: https://environmentza-my.sharepoint.com/:f/g/personal/fditinti_environment_gov_za/EnSN8C845udHg2gH3dJRQmQBy3sLII3PYMHKKRA9OucVVA?e=zXcx7a</p> <p>The comments are due on 29 March 2021.</p>
<p>Date: 25 02 2021 (Email) Ms Briega Williams South African Heritage Resources Agency Heritage Officer</p>	<p>Yes, the documents are uploaded onto SAHRIS, thanks!</p>	<p>Thank you for confirming that the Final Scoping Reports for Duynefontein – Case 15795 and Yzerfontein – Case 15812 have been successfully uploaded to the SAHRA website.</p>
<p>Date: 25 02 2021 (Email) Mr Robert Landman I & J Limited</p>	<p>Please drop the final scoping report for the telecom cables in this link as I do not have access to Dropbox.</p>	<p>The document was sent to Mr Landman on 26 02 2021.</p>
<p>Date: 26 02 2021 (Email) Mr Marius Wheeler CapeNature</p>	<p>No further feedback from CapeNature.</p>	<p>It is noted that Cape Nature has no further feedback on the Scoping Report.</p>
<p>Date: 26 02 2021 (Email) Ms Nicole Lomborg Eni/Sasol</p>	<p>Dropbox does not allow me to download the report – it says the file does not exist. Could you send it to me please?</p>	<p>ACER sent Ms Lomborg the documents via WeTransfer on 26 Feb 2021.</p>
<p>Date: 01 03 2021 (Email) Ms Briega Williams South African Heritage Resources Agency Heritage Officer</p>	<p>Thank you for your below email confirming receipt of the comment. I have now also issued a comment for the Yzerfontein subsea cable and uploaded it onto SAHRIS. I have also attached a copy to this email.</p> <p>Interim Comment In terms of Section 38(8) of the National Heritage Resources Act (Act 25 of 1999)</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 Final Scoping Report (FSR) for the proposed 2AFRICA</p>	

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	<p>(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 FSR has identified that a Heritage Assessment is to be undertaken as part of the process, and SAHRA supports this.</p> <p>In terms of the National Heritage Resources Act, No. 25 of 1999 (NHRA), Sections 2 and 35 stipulates that any wreck, being any vessel or aircraft or any part thereof older than 60 years old lying in South Africa's territorial waters or maritime cultural zone is protected and falls under the jurisdiction of SAHRA's Maritime and Underwater Cultural Heritage Unit. These heritage sites or objects may not be disturbed without a permit from the relevant heritage resources authority.</p> <p>There are no known wrecks at the landing site of the cable, however the proposed cable runs to the north of Dassen Island which has a large number of known wrecks in the waters surrounding it. Most of the wrecks are close to the island but there is a possibility that unrecorded wrecks may also lie in area of the proposed route north of the island.</p> <p>Further away from the island there are a number of modern wrecks (Apollo Sea (1994), Shing Tung Yong (1978) and St Gerard (1983)) that are recorded as possibly lying in the vicinity of the proposed route of the cable. While these are modern, care must be taken to avoid them as they are a potential hazard.</p> <p>Due to the possibility that heritage resources may be present along the proposed route of the cable, the heritage assessment must include a specialist study of maritime heritage to be undertaken by a suitably qualified Maritime Archaeologist.</p> <p>SAHRA is pleased to note that one of the two amendments that were requested in the previous comment on the Draft Scoping Report has been accepted and updated in the FSR, namely the addition of SAHRA as a key stakeholder.</p>	<p>A Heritage Assessment will be undertaken as part of the Impact Assessment process.</p> <p>SAHRA's information regarding wrecks in the vicinity of the proposed marine cable for the 2Africa (West) Cable System (Yzerfontein landing) is appreciated and will be taken into consideration in the Impact Assessment.</p> <p>The specialist Heritage Assessment will be undertaken by a suitably qualified maritime archaeologist as part of the Impact Assessment.</p> <p>This sentence will be updated in the EIA (as applicable).</p>

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	<p>However, SAHRA is disappointed to note that the following request: “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>, has not been made and the paragraph in the FSR remains unchanged. This sentence must be updated in the EIA to ensure the correct information is provided in the document.</p> <p>Section 8.6 indicates that survey data for the alignment of the subsea cable will be provided to the heritage specialist for review, this is supported by SAHRA as it is an important aid to inform the specialist report.</p> <p>The applicant is advised that a comment on possible terrestrial heritage impacts from the relevant Provincial Heritage Resources Authority (PHRA) must be obtained in addition to this comment.</p> <p>All correspondence and reports relating to this project must be uploaded to the South African Heritage Resources Information System (SAHRIS) to provide SAHRA with the opportunity to comment. SAHRA does not accept hard copy documents, links to documents, or documents received via post.</p> <p>Should you have any further queries, please contact the designated official using the case number quoted above in the case header.</p> <p>ADMIN: Direct URL to case: https://sahris.sahra.org.za/node/546465 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. 	

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<p>Date: 02 03 2021 (Email) Ms Stephanie Barnardt Heritage Western Cape</p>	<p>I discussed this with Waseefa, she has confirmed that no trigger can be taken as our final word.</p> <p>The only case that I can think of is when there was initial no trigger then the proposed changes, example proposed pipeline was under 300m then the applicant revised the proposal and it is now more than 300m. That will trigger section 38(1)(a) then formal NID must be submitted.</p> <p>HWC cannot comment on matters which do not trigger the NHRA.</p>	<p>It is understood that HWC comments on the Yzerfontein and Duynefontein cable projects are not required, as comment is not required in terms of the NHRA.</p>
<p>Date: 03 03 2021 (Email) Ms Julliet Mahlangu Department of Environment, Forestry & Fisheries Integrated Environmental Authorisations</p>	<p>14/12/16/3/3/2/2047</p> <p>ACKNOWLEDGEMENT OF RECEIPT OF THE FINAL SCOPING 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 final Scoping Report and Application form for the abovementioned project on 25 February 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>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>Kindly quote the abovementioned reference number in any future correspondence in respect of the application.</p>	<p>The acknowledgement of receipt of the FSR from DEFF (Integrated Environmental Authorisations) on 03 03 2021 is appreciated.</p> <p>No activities will commence prior to an Environmental Authorisation being granted by the Department.</p> <p>Noted.</p>
<p>Date: 26 03 2021 (Email) Department of Environment, Forestry & Fisheries Oceans & Coasts</p>	<p>Kindly find attached comments for your perusal and implementation on the Final 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>Kindly note that all future correspondence and documentation, Enquiries, Meetings and site inspection requests related to EIA applications (hard copy and an</p>	<p>Thank you for your email and comments received.</p> <p>Noted.</p>

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	<p>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 Coast, 2 East Pier Building, East Pier Road, Victoria and Alfred Waterfront, Cape Town, 8001.</p> <p>SUBJECT: COMMENTS THE FINAL 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 Final 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 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. We have reviewed the Final 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, and have noted the response to our comments provided on the Draft Scoping Report for this project. This Branch advocate for implementation of Comments provided on the Draft Scoping report, more especially concerning the need for the EAP to provide outstanding information/assessment reports acknowledged in your response to our comments provided on the Draft Scoping report. A copy has been attached for your easy reference. 2. It is a recommendation of this Branch that the competent authority ensures that all comments and recommendations made be taken into account and implemented throughout the proposed project phases. 	<ol style="list-style-type: none"> 1. The outstanding information referred to has been addressed and included in the DEIAR. 2. This comment to the CA is noted.

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	<p>Comments on the Final 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> <ol style="list-style-type: none"> 1. The last paragraph on p88 is incomplete. 2. The humpback whale superpods occur between north of St Helena Bay and Cape Point, including the area of interest offshore the landing points, during several months of the year. The presence of these whales can extend into January-February. The presence of the superpods and their timing should be taken into account for proposed activities in the territorial waters offshore the landing site alternatives. 3. On p80-81, interactions with MPAs and focus areas for offshore protection are considered. The focus areas for offshore protection were integrated in the description of Ecologically or Biologically Significant Marine Areas (EBSAs), and parts of many were incorporated in the declaration of 20 MPAs (mainly offshore) in 2019. 4. It would make more sense to explore the interaction of the proposed cable with the new Coastal and Marine Critical Biodiversity Areas map (available at https://cmr.mandela.ac.za/Research-Projects/EBSA-Portal/South-Africa/National-Coastal-and-Marine-Spatial-Biodiversity-P). 5. The CBA Map incorporates existing spatial priorities such as EBSAs, focus areas and other information, and presents a spatial plan for the marine environment, designed to inform planning and decision-making regarding activities such as this, in support of sustainable development. 6. The report seems ambivalent on the need for a marine specialist study (this was also pointed out in the draft report). 	<p>Comments on the Final 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> <ol style="list-style-type: none"> 1. The EAP has checked and confirmed that the last paragraph on page 88 of the FSR is complete. Please further clarify the section number and sub-heading of the incomplete paragraph. 2. The seasonality of different whale species in the impact zone (including the Humpback) is tabled in the marine ecology specialist report. Mitigation measures will need to be adopted year round as seasonalities are spread throughout the year between the different species. The specialist recommends avoiding installation across the continental shelf during the whale migration period (June-November). Various other mitigation measures to avoid impacts on whales are recommended in the DEIAR. 3. This is noted and referred to in the DEIAR. 4. The marine ecology specialist report has been updated to include the new Coastal and Marine Critical Biodiversity Areas map. Reference to this map and the affected CBAs is also provided in the DEIAR. 5. Noted. Reference to this map and the affected CBAs is provided in the DEIAR. <p>Items 6-12:- see below.</p>

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	<p>7. It says (on p. 36) that “A marine specialist will be appointed to assess the impacts on any marine protected areas and marine fauna and flora” and ‘Marine ecosystems’ are identified as one of the knowledge gaps.</p> <p>8. In the Executive Summary on p IX, the Marine Ecology Specialist Study is identified as one of 6 specialist studies that need to be undertaken. Also, on p111 it says, “A marine ecological impact assessment will be undertaken, in addition to a marine fisheries impact assessment.”</p> <p>9. Yet under Section 10.2, only 5 specialist studies are identified, excluding marine ecology. Marine impacts area not considered under the 7 key questions that were formulated based on impacts identified on p VIII of Executive Summary (on p. 112 there are 8 key questions including one on the marine environment and MPAs), and also on p VIII it says “Within the marine environment, impacts on the biophysical environment are considered negligible”.</p> <p>10. On what basis are the impacts on the marine environment (including its fauna) considered negligible, where in the scoping report is this supported? Why is the report generally ambiguous about the need for a marine ecology specialists’ study?</p> <p>11. Similarly, with regard to seabirds. On p 111, it says “DEFF – O&C have raised concerns with regards to bird mortalities associated with cable laying operations on previous marine telecommunication projects. As such, an assessment will be undertaken to assess the possible impact on offshore bird species”, and on p113: “An avifauna specialist will be commissioned to assess the potential impact posed by the cable laying ship during cable installation on offshore migratory bird species for the installation of the 2AFRICA (West) Cable System”. Yet marine avifauna is not among the specialist studies listed under 10.2, nor in the executive summary.</p> <p>12. The EAP is required to provide a response on the actual specialist studies to be undertaken. And if the above said specialist will be excluded, what is the reason and motivation.</p>	<p>In response to items 6 to 12, please note there was no intention to exclude a marine specialist study from this EIA. These TOR were omitted in error from the Plan of Study in the FSR. Terms of Reference for a Marine Ecological Impact Study were indeed compiled and a specialist study commissioned. Similarly, ACER commissioned two additional specialist studies to address impacts on avifauna (seabirds and shorebirds) and marine mammals, to support the findings of the marine ecology report and address concerns of O&C. The final specialist studies undertaken, as referred to in the DEIAR and contained in Appendix B of the DEIAR are:</p> <table border="1" data-bbox="1346 555 2152 1385"> <thead> <tr> <th></th> <th data-bbox="1346 555 1749 619">Specialist Study</th> <th data-bbox="1749 555 2152 619">Organisation</th> </tr> </thead> <tbody> <tr> <td data-bbox="1346 619 1384 751">1</td> <td data-bbox="1384 619 1749 751">Compliance Statement for Terrestrial and Freshwater Ecosystems</td> <td data-bbox="1749 619 2152 751">Inland Waters Consultancy in association with Capensis</td> </tr> <tr> <td data-bbox="1346 751 1384 850">2</td> <td data-bbox="1384 751 1749 850">Commercial Fisheries Specialist Study</td> <td data-bbox="1749 751 2152 850">Capricorn Marine Environmental (Pty) Ltd (CapMarine)</td> </tr> <tr> <td data-bbox="1346 850 1384 949">3</td> <td data-bbox="1384 850 1749 949">Beach and Coastal Dune Dynamics Impact Assessment</td> <td data-bbox="1749 850 2152 949">SDP Ecological & Environmental Services</td> </tr> <tr> <td data-bbox="1346 949 1384 1048">4</td> <td data-bbox="1384 949 1749 1048">Marine Ecology Assessment</td> <td data-bbox="1749 949 2152 1048">Pisces Environmental Services (Pty) Ltd</td> </tr> <tr> <td data-bbox="1346 1048 1384 1147">5</td> <td data-bbox="1384 1048 1749 1147">Maritime Archaeological Impact Assessment</td> <td data-bbox="1749 1048 2152 1147">ACO Associates cc</td> </tr> <tr> <td data-bbox="1346 1147 1384 1316">6</td> <td data-bbox="1384 1147 1749 1316">A review of the potential effects of submarine telecommunications cables on marine mammals in Southern Africa</td> <td data-bbox="1749 1147 2152 1316">Sea Search Research and Conservation</td> </tr> <tr> <td data-bbox="1346 1316 1384 1385">7</td> <td data-bbox="1384 1316 1749 1385">Submarine Telecommunications Cables Environmental Impact</td> <td data-bbox="1749 1316 2152 1385">WildSkies Ecological Services (Pty) Ltd</td> </tr> </tbody> </table>		Specialist Study	Organisation	1	Compliance Statement for Terrestrial and Freshwater Ecosystems	Inland Waters Consultancy in association with Capensis	2	Commercial Fisheries Specialist Study	Capricorn Marine Environmental (Pty) Ltd (CapMarine)	3	Beach and Coastal Dune Dynamics Impact Assessment	SDP Ecological & Environmental Services	4	Marine Ecology Assessment	Pisces Environmental Services (Pty) Ltd	5	Maritime Archaeological Impact Assessment	ACO Associates cc	6	A review of the potential effects of submarine telecommunications cables on marine mammals in Southern Africa	Sea Search Research and Conservation	7	Submarine Telecommunications Cables Environmental Impact	WildSkies Ecological Services (Pty) Ltd
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	<p>13. Please be advised that the Sub Directorate: Coastal Development and 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><u>NB: Findings of assessment on the proposed site, alternatives, technology and methodology suitability will be provided when the Environmental Impact Assessment Report becomes available.</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. 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>	<table border="1"> <tr> <td data-bbox="1344 209 1382 308"></td> <td data-bbox="1382 209 1749 308">Assessment. Generic Avifaunal Impact Assessment</td> </tr> </table>		Assessment. Generic Avifaunal Impact Assessment	
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		Please refer to Chapter 9 of the DEIAR for a summary of specialist findings.			
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