

**Our Ref:**



an agency of the  
Department of Arts and Culture

T: +27 21 462 4502 | F: +27 21 462 4509 | E: [info@sahra.org.za](mailto:info@sahra.org.za)  
South African Heritage Resources Agency | 111 Harrington Street | Cape Town  
P.O. Box 4637 | Cape Town | 8001  
[www.sahra.org.za](http://www.sahra.org.za)

Enquiries: Briega Williams  
Tel: 021 462 4502  
Email: [bwilliams@sahra.org.za](mailto:bwilliams@sahra.org.za)

Date: Wednesday August 11, 2021  
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CaseID: 15814

## **Interim Comment**

### **In terms of Section 38(8) of the National Heritage Resources Act (Act 25 of 1999)**

Attention: Liquid Telecom South Africa

### **Proposed Marine Telecommunications System (2AFRICA/GERA (East) Cable System) to be landed at Amanzimtoti, Kwazulu-Natal on the East Coast of South Africa**

The South African Heritage Resources Agency (SAHRA) would like to thank you for submitting the Draft Environmental Impact Assessment Report (DEIAR) for the proposed Marine Telecommunications system (2AFRICA/GERA (East) cable system) to be landed at Amanzimtoti, KZN on the East coast of South Africa.

As part of the Environmental Authorisation process a Scoping Report was undertaken which SAHRA commented on in April 2021 and stated that a Maritime Heritage Impact Assessment (MHIA) must be included as part of the Environmental Impact Assessment.

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.

The proposed cable runs to the south of Durban and lands at Amanzimtoti. The nearest recorded wreck is the Griqualand which lies approximately 4.5km SE of the landing site, it is less than 60 years of age and thus not currently subject to the NHRA but it is classified as a dangerous wreck as it is said to contain cylinders of chlorine. There are no recorded historic wrecks in the immediate vicinity of the proposed cable route. However, there are a number of wrecks further out in deeper waters which were casualties of German U-boats during the Second World War. The locations of these wrecks are approximate positions but as they are considered war graves their possible presence and cultural heritage significance should be highlighted during the heritage assessment.

SAHRA has reviewed the DEIAR and the included MHIA. The MHIA sets out the historical background of the



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area and considers the likelihood of encountering heritage resources. This research has informed the recommendations laid out in the MHIA which have been incorporated into the DEIAR under section 10.6.5. These recommendations are:

- Should any possible archaeological or palaeontological material be accidentally disturbed during these activities it must be immediately reported to the ECO and/or the monitoring archaeologist for further advice. Any finds accidentally disturbed must be recorded, and their contextual information (a report) must be lodged with a SAHRA approved institution.
- The potentially anthropogenic seabed anomalies (SSS contacts E3-A-S005 and associated linear contact, E3-G-S0213, E3-G-S214, E3-G-S210 and E3-G-S219 and magnetic anomalies E3-G-M001 - E3-G-M005) are avoided during cable installation.
- Any further geophysical data generated to support to installation of the cable system must be archaeologically reviewed for the presence of historical shipwrecks or related material. If possible, the project archaeologist should be consulted before data are collected to ensure that the survey specifications and data outputs are suitable for archaeological review.
- Any shipwreck-related material recovered from the seabed during the pre-lay grapnel runs must be retained, kept wet, and the maritime archaeologist must be notified of the find.
- Should the data identify wreck material at or near the location of any portion of the cable, micro-siting of the cable and/or the possible implementation of an exclusion zone around the archaeological feature should be sufficient to mitigate the risks to the site.
- Should any maritime archaeological sites or material be accidentally encountered during the course of laying the cable, work must cease in that area until the project archaeologist and SAHRA have been notified, the find has been assessed by the archaeologist, and agreement has been reached on how to deal with it.
- The Griqualand is classified as a dangerous wreck and should be avoided.
- In respect of potential submerged prehistoric archaeology, it is recommended that an alert for the occurrence of such material be included in the EMPr for the project, specifically for the divers working in the shoreface and the operators excavating the trench in the beach and dune during cable installation. The project archaeologist should provide the ECO and contractors with information about the type of material that could be encountered.
- In respect of palaeontology, there is a very small chance that fossils may occur in the Umkwelane Formation aeolianites so a Fossil Chance Find Protocol should be added to the EMPr. If fossils are

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found once trenching has commenced, then they should be rescued and a palaeontologist called to assess and collect a representative sample.

These recommendations are supported by SAHRA and must be adhered to especially in the event that any cultural heritage should come to light. SAHRA has noted that these supported recommendations have also been included in the Draft EMPr.

Should any shipwrecks be identified as part of this project then SAHRA must be notified to enable the information to be added to the national shipwreck database. Any new discoveries or updated data is a valuable resource in adding to our knowledge of South Africa's maritime history.

Should you have any further queries, please contact the designated official using the case number quoted above in the case header.

Yours faithfully

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Briege Williams  
Heritage Officer  
South African Heritage Resources Agency

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Lesla la Grange  
Manager: Maritime and Underwater Cultural Heritage  
South African Heritage Resources Agency

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### ADMIN:

Direct URL to case: <https://sahris.sahra.org.za/node/546472>

### Terms & Conditions:

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.