

Our Ref:



an agency of the
Department of Arts and Culture

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South African Heritage Resources Agency | 111 Harrington Street | Cape Town
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CaseID: 15814

Date: Wednesday March 31, 2021
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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 Scoping Report (DSR) 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 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.

In terms of the National Heritage Resources Act, No 25 of 1999 (NHRA), Sections 2 and 35 stipulate that any wreck, being any vessel or aircraft, or any part thereof, older than 60 years 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 an unknown wreck lying approximately 4.5km SE of the landing site which is marked as a hazard 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 any heritage assessments.

Due to the possibility that heritage resources may be present along the proposed route of the cable, the heritage impact assessment must include a specialist study of maritime and underwater cultural heritage to be

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undertaken by a suitably qualified Maritime Archaeologist.

Section 8.6.2 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.

On page vi of the Executive Summary is a table that lists the required permissions and licences, it states that an Offshore Heritage Permit is required from SAHRA, however, it must be noted that this is not a requirement and can only be applied for if the need for mitigation arises.

On Page 23 under Section 5.1.6 the first line of the last paragraph reads *“Note 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 Nm seaward from the high-water mark of the sea.”* This sentence is somewhat confusing and should read *“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.”*

It is stated in Section 5.7.10 that *“SAHRA will comment on the project with regard to marine and terrestrial cultural heritage resources. Their provincial counterpart, Amafa, has also been notified for comment.”* Please note that in this case SAHRA will only be commenting on the underwater cultural heritage and that Amafa will provide the comment for the terrestrial heritage. A comment obtained from SAHRA does not exonerate the applicant from obtaining a comment from the relevant Provincial Heritage Resources Authority.

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.

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

Yours faithfully

**2AFRICA/GERA (East) Cable System to Be Landed at Amanzimtoti,
KwaZulu-Natal, South Africa**

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Briege Williams
Heritage Officer
South African Heritage Resources Agency

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

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.