

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
P.O. Box 4637 | Cape Town | 8001
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Enquiries: Briege Williams
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CaseID: 15795

Date: Thursday January 21, 2021
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Interim Comment

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

Attention: MTN (Pty) Ltd

Building 1 Commerce Square
39 Rivonia Road
Sandton
0046

Proposed 2AFRICA/GERA (East) submarine fibre optics cable system to be landed at Duynfontein, City of Cape Town, Western Cape.

The South African Heritage Resources Agency (SAHRA) would like to thank you for submitting the Draft Scoping Report (DSR) for the proposed 2AFRICA/GERA (East) submarine fibre optics cable system to be landed at Duynfontein on the West 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 north of both Robben Island and Table Bay. Historically both areas have seen a high volume of maritime traffic and casualties. There are a number of vessels which are recorded as lying in the proximity of the route of the proposed cable.

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The nearest recorded wreck on SAHRA's database is that of the French vessel L'Lucie (1808) which is recorded as wrecking 3.5km south of the cable landing site in Melkbosstrand. It must, however, be noted that shipwreck co-ordinates on SAHRA's database may not be accurate and the potential for other wrecks to lie close to the proposed cable route exists.

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 undertaken by a suitably qualified Maritime Archaeologist.

Section 8.7 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 15 under Section 3.1.5 the last sentence of the last paragraph reads *"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."* 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."*

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.

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

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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://sahrissahra.org.za/node/545938>

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.