

Proposed Submarine Telecommunications Cable System (T3 Submarine Cable System) to be Landed at Amanzimtoti, Kwazulu-Natal South Africa

Our Ref:



an agency of the
Department of Arts and Culture

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Date: Monday December 13, 2021

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CaseID: 16303

Final Comment

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

Attention: Liquid Telecom

Alcatel Submarine Networks has been contracted to supply and install the proposed T3 submarine cable system connecting South Africa to Mauritius with branching units to Madagascar and Reunion. The South African landing is proposed to be at Amanzimtoti, KwaZulu-Natal on the East Coast of South Africa and is to be operated by Liquid Telecom as the South African Landing Partner.

The South African Heritage Resources Agency (SAHRA) would like to thank you for submitting the Draft Environmental Impact Assessment Report (DEIAR) for the proposed T3 Telecommunications 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 October 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. There are no recorded historic wrecks in the immediate vicinity of the proposed cable route or near the landing site. There is a modern wreck recorded within 1km of the cable alignment, the *Mary Kate* which was a fishing trawler that sank in 1976 and therefore is not currently protected by the NHRA. 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.



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SAHRA has reviewed the DEIAR and the included MHIA. The MHIA sets out the historical background of the 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 10.6.3. These recommendations are:

- Should any archaeological or palaeontological material be accidentally disturbed during these activities it must be immediately reported to the ECO and/or the monitoring archaeologist or palaeontologist (as relevant) for further advice. Any finds accidentally disturbed must be recorded, and their contextual information (a report) must be lodged with a SAHRA-approved institution.
- No archaeological or palaeontological material may be recovered from the seabed without a prior permit being obtained from SAHRA.

- In respect of shipwrecks and maritime archaeology, the following is recommended:
 - If any shipwreck-related material is recovered from the seabed during the pre-lay grapnel runs it must be retained, kept wet, and the project archaeologist and SAHRA must be notified of the find.
 - The potentially anthropogenic linear seabed anomalies in the Inshore Survey area 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.
 - 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.

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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.

While there are no known historic shipwreck sites within the proposed cable route there is always the potential for unknown wrecks or shipwreck material to be uncovered during the works. Should anything of archaeological or paleontological significance be exposed during the proposed project, work must cease immediately and SAHRA must be informed of its discovery without delay. In this event, work may not commence until feedback has been received from SAHRA. 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.

Please note that all updates and/or changes to the project, supporting documentation, correspondence, reports, or any other work relating to the project must be uploaded to the case on SAHRIS to provide SAHRA with the opportunity to comment. SAHRA does not accept emailed documents or hard-copy 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

Briega 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

ADMIN:

Direct URL to case: <https://sahris.sahra.org.za/node/567470>

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.