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reference SSD14/2/6/1/4/1/marine telecom_Melkbosstrand
date 13 December 2016

ACER (Africa) Environmental Consultants
P.O. Box 503
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Attention: Giles Churchill
By email: ace-cable@acerafrica.co.za

Dear Giles

Draft Scoping Report for the Proposed MTN Marine Telecommunications System (ACE Cable System), van Riebeeckstrand, Melkbosstrand, Cape Town (DEA&DP ref: 16/3/1/1/A2/30/3067/14)

CapeNature would like to thank you for the opportunity to comment on the proposed development and would like to make the following comments. Please note that our comments only pertain to the biodiversity related impacts and not to the overall desirability of the proposed development.

The proposal is for a marine telecommunications cable landing in along the Atlantic coastline north of Cape Town. Various alternative landing locations were selected and screened for feasibility. The two landings at Yzerfontein and at Melkbosstrand main beach were screened out due to the proximity to existing marine cables. The remaining three landings were at van Riebeeckstrand/Duynfontein. The southernmost landing site was screened out as it was considered the most sensitive dune environment.

The two landing alternatives taken forward were the two at Duynfontein, from which the two terrestrial cable alignment alternatives were designed, both of them terminating at the proposed cable landing station (CLS) in Duynfontein. As the two alternatives both follow the same alignment in the middle section before separating again, the terrestrial cable alignment can therefore be divided into four alternatives when considering the variations, or otherwise two alternatives for the first section and another two alternatives for the second section.

As indicated in the Draft Scoping Report, both of the landing alternatives traverse a section of Other Natural which consists of the coastal dune system. Alternative A is aligned adjacent to Critical Biodiversity Area (CBA) 1b according to the Biodiversity Network (BioNet) for the City of Cape Town in the section before it reaches the CLS, which is also classified as CBA in the draft internal version of the provincial biodiversity spatial plan. As indicated on the supporting maps, the natural vegetation that does/would have occurred along the alignments is Cape Flats Dune Strandveld (Endangered) and Atlantis Sand Fynbos (Critically Endangered).

No wetlands have been mapped along the alignment on the BioNet, although it should be noted that sensitive wetlands have been recorded in the vicinity of the two alternative landings.

The Western Cape Nature Conservation Board trading as **CapeNature**

Board Members: Ms Merle McOmbring-Hodges (Chairperson), Dr Colin Johnson (Vice Chairperson), Mr Mervyn Burton, Prof Denver Hendricks, Dr Bruce McKenzie, Adv Mandla Mdludlu, Mr Danie Nel, Prof Aubrey Redlinghuis, Mr Paul Slack, Prof Kamilla Swart-Arries

The Plan of Study for EIA indicates that a vegetation and ecological specialist study, a fisheries specialist study, a wetlands specialist study and a beach and coastal dune dynamics specialist study will be undertaken. The above listed specialist studies should adequately address the biodiversity related impacts associated with the project.

It must be ensured that the beach and coastal dune dynamics specialist report informs the vegetation and ecological specialist study and/or is undertaken by a specialist with experience in coastal dune systems, as the primary affected habitat will be the coastal dune system.

In terms of the impacts on coastal and marine ecosystems, CapeNature's mandate extends up to the high water mark of the sea and not below unless it is within a marine protected area managed by CapeNature. It is therefore trusted that the impacts on the coastal and marine environment will be adequately assessed and reviewed by the relevant authorities.

It is evident that specialist input has already gone into the screening study to screen out the various alternatives. The specialist studies must refer to all of the alternatives assessed prior to screening in order to provide the necessary information and motivation for screening these alternatives out, particularly where the motivation for screening these alternatives was biodiversity-related impacts.

In addition to providing landing location alternatives and terrestrial cable alignment alternatives, technology alternatives should be presented and assessed. In particular with regard to the methodology of laying the cable in the section between where it makes landfall to beyond the coastal dune system, as this can affect the level of disturbance to the system and hence the significance of the impacts on biodiversity.

In conclusion, CapeNature will comment in further detail on the development proposal and various alternatives in the EIA Phase once the specialist reports are made available. We will also comment on the Final Scoping Report to assess any amendments on the proposed way forward.

CapeNature reserves the right to revise initial comments and request further information based on any additional information that may be received.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Rhett Smart', with a horizontal line underneath.

Rhett Smart
For: Manager (Scientific Services)