

MTN (Pty) Ltd.

PRE-APPLICATION MEETING WITH COMPETENT AUTHORITY WITH REGARDS TO THE PROPOSED LANDING OF THE ACE CABLE SYSTEM, WESTERN CAPE

7 June 2016

Meeting Minutes

List of Attendees:

- | | | |
|----------------------|-------------|--|
| • Giles Churchil | Acer Africa | giles.churchill@acerafrica.co.za |
| • Takalani Tshivhase | MTN Dubai | tshivhase@mtn.com |
| • Steffens Potgieter | MTN SA | Steffens.Potgieter@mtn.com |
| • Willem Weber | MTN SA | Willem.Weber@mtn.com |
| • Jeff Hinds | MTN SA | Jeff.Hinds@mtn.com |
| • Sindiswa Dlomo | DEA | SDlomo@environment.gov.za |
| • Nyiko Nkosi | DEA | nnkosi@environment.gov.za |
| • Fiona Grimett | DEA | fgrimett@environment.gov.za |

1. WELCOME AND GREETINGS

- Ms S Dlomo welcomed everyone and introductions were made by all attending.

2. BRIEF PROJECT BACKGROUND

- Mr G Churchill thanked the DEA representatives for agreeing to meet with ACER and MTN on short notice and then asked Mr T Tshivhase from MTN to provide a brief explanation to the background of the proposed project and how it fits in with the proposed submarine telecommunications cable, referred to as the ACE cable system, to link South Africa, West Coast of Africa and Europe with key international telecommunication hubs in Europe.
- Mr Churchill then explained that the project requiring authorization from DEA was the landing of the ACE cable system in South Africa from when it enters our territorial waters to the landing of the cable on South Africa's coastline and its alignment from there to the current MTN Cable Landing Station (CLS) located in Duynefontein in the Western Cape.

3. TASKS UNDERTAKEN BY MTN AND ACER TO DATE

- Mr Churchill explained that the proposed landing of the ACE cable system has been extensively investigated by MTN over the last few months in an attempt to find the most suitable location for landing the cable in the Western Cape. Initially two alternative landing locations were investigated, namely Yzerfontein and Melkbosstrand. These landing locations were selected following consideration of not only environmental issues, but also those associated with marine engineering (e.g. security of the route against external risks) and commercial aspects (e.g. proximity to national networks and their international access points). From the beach landing point the cable will be laid in a trench to Duynefontein (suburb located just inland from Melkbosstrand) where MTN has a Cable Landing Station.
- Mr Churchill explained that Yzerfontein was excluded as a viable alternative due to a number of reasons and was considered fatally flawed by MTN from a risk and operational perspective. Following the exclusion of Yzerfontein as a possible landing alternative MTN then looked at Melkbosstrand in more detail and identified four possible landing sites along the Melkbosstrand Beach for further assessment.

- ❑ Mr Weber and Mr Hinds also stated that two of the alternatives considered as possible landing sites were later rejected due to the expected impacts on the community of Melkbosstrand, servitude constraints and the fact that the ACE cable system would have to cross existing telecommunication cables which land in Melkbosstrand.
- ❑ Mr Churchill then showed the DEA representatives the proposed landing sites on the maps and photo reports provided and explained the constraints of each site based on preliminary site investigations. Based on these investigations two possible landing sites are considered viable which will be the alternative landing options considered further in the EIA.
- ❑ Mr Tshivhase and Mr Churchill explained that the preferred landing alternatives had been selected based on the following considerations:
 - Impacts on the community in Melkbosstrand.
 - Impacts on dune and coastal vegetation (both sites 1 and 2 have existing disturbances taking place through maintenance activities by the City of Cape Town)
 - Availability of City of Cape Town servitudes from the beach to the CLS site.
 - Length of the cable land route (Sites 1 and 2 have the shortest cable routes and thus the least potential to impact on the biophysical, economic and social environments).
 - Lack of existing power lines in the area (Power lines which the ACE cable needs to cross under or run alongside will affect the transmission quality due to power induction of the ACE cable system and as such power lines are avoided where possible).
- ❑ Ms Dlomo stated that ACER must include a description of the process followed to arrive at these alternatives in the Scoping Report so that the department and I&APs have an understanding of the investigations carried out and why these alternatives were finally selected for the EIA.

4. SPECIALIST STUDIES PROPOSED

- ❑ Mr Churchill gave a brief description for the expected impacts associated with the construction of the ACE cable system and outlined that the following specialist studies had been identified following literature reviews of similar projects within the area and an assessment of the proposed landing sites:
 - Vegetation assessment
 - Heritage Assessment
 - Marine and Fisheries Assessment
 - Socio-economic Assessment
 - Beach and Dunes Dynamics Assessment
 - Wetland Delineations and Functional Assessments (if required)
- ❑ Mr Churchill then asked the DEA to confirm if they felt that the proposed specialist studies adequately covered the anticipated impacts to which they responded by saying that the proposed specialist studies were comprehensive as far as they were concerned.
- ❑ The DEA stated that additional specialist input may be required if the need arises during the scoping and public participation phases.
- ❑ Ms Dlomo suggested that ACER contact Mr Allan from Oceans and Coasts as he may want additional items assessed in the marine based studies. Mr Churchill thanked Ms Dlomo for this advice.

5. EIA PROGRAMME

- ❑ Ms Dlomo requested that Mr Churchill show the DEA the anticipated EIA programme for the project bearing in mind the tight timelines under the current regulations.
- ❑ Mr Churchill presented the EIA programme and stated that ACER was fully aware of the EIA timeframes and the need to meet these timeframes once the project was registered with the DEA.
- ❑ Mr Churchill stated that project notification and advertising would take place prior to the submission of the application for authorisation and that it was ACER's intention to have the Draft Scoping Report ready for submission together with the Application for Authorisation. Both would be submitted to the DEA simultaneously.
- ❑ Given the timeframes most of the specialist studies will be commissioned early on in the EIA.
- ❑ Mr Potgieter from MTN raised concerns in terms of project timing with regards to the construction of the Cable Landing Station (CLS). Mr Churchill responded by saying that the construction of the CLS does not have any impact on the EIA programme as it is a totally separate project and not part of the EIA process.
- ❑ Ms Dlomo concurred with this and stated that the only risk to MTN would be that if they build the CLS and the cable landing is not authorised they would have wasted their money.
- ❑ Mr Churchill also stated that the programme and specifically the initial public participation hinged on the City of Cape Town agreeing on the proposed land alignments for the ACE cable. The City of Cape Town planners have been involved in the project planning but ACER wants to be very sure that the proposed land route is doable from the Cities perspective prior to notifying I&APs of the proposed land alternatives for the alignment.
- ❑ Mr Churchill stated that ACER will set up a meeting between MTN, City of Cape Town Planners and the City of Cape Town Environmental department to consider and agree on the best possible alignment for the cable from the landing site to the CLS site.
- ❑ Mr Churchill asked Ms Dlomo what would happen if only one alignment was feasible from the City of Cape Towns perspective and how that would influence the EIA in terms of assessing alternatives. Ms Dlomo responded by saying that would not be a problem as long as ACER can show in the Scoping and EIA reports that alternatives were considered but only one possible alignment was feasible. This would have to be backed up with written confirmation by the City of Cape Town Planners and the reasons thereof.

6. GENERAL DISCUSSION AND MEETING CLOSURE

- ❑ Ms Dlomo indicated to Mr Churchill that the department has an open door policy and that they would assist where they can to make the EIA process run smoothly. She also indicated that should ACER have any queries or concerns regarding the EIA requirements that they should get hold of the department timeously so that the EIA does not extend beyond the permissible timeframes. Should this happen the EIA would have to be started again.
- ❑ Mr Tshivhase thanked Ms Dlomo and her team for making time available to meet with MTN.
- ❑ Mr Churchill also thanked Ms Dlomo and her team for making time available to meet with MTN and ACER at such short notice.
- ❑ Mr Churchill asked Ms Dlomo and her team if there was any other information they would like to know with regards to the project. Ms Dlomo responded by saying that she thought they had a good understanding of the proposed project and what MTN was applying for authorisation for.