



an agency of the  
Department of Arts and Culture

T: +27 21 462 4502 | F: +27 21 462 4509 | E: info@sahra.org.za  
South African Heritage Resources Agency | 111 Harrington Street | Cape Town  
P.O. Box 4637 | Cape Town | 8001  
www.sahra.org.za

Enquiries: Lesa la Grange  
Tel: 0212028658  
Email: llagrange@sahra.org.za  
CaseID: 10322

Date: Wednesday November 30, 2016  
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## Interim Comment

### In terms of Section 38(2) of the National Heritage Resources Act (Act 25 of 1999)

Attention: MTN (Pty) Ltd  
Building 1 Commerce Square  
39 Rivonia Road  
Sandton

**MTN (Pty) Ltd proposes installing a submarine telecommunications cable, referred to as the Africa Coast to Europe (ACE) cable system, to link South Africa, the West Coast of Africa and Europe with key international telecommunication hubs in Europe. MTN SA aims to secure local landing permits to land the ACE Cable System as the designated Landing Partner of the Cable System in South Africa and has the required licenses to operate international telecommunication infrastructure in the country**

The applicant (MTN Pty Ltd) wishes to secure local landing permits to land the Africa Coast to Europe (ACE) telecom cable at van Riebeeckstrand. The offshore cable routes, exceeding 300m in length and traversing the 24 Nautical mile buffer zone which is SAHRA's remit, triggers Section 38 of the National Heritage Resources Act (No. 25 of 1999).

SAHRA thanks MTN for the opportunity to comment on the above application. Given that it is noted in the Draft Scoping Report (DSR) that an unknown shipwreck is located at 33°44.500'S, 18°22.000'E along the southern shallow water alignment, SAHRA exacts the following terms and conditions relating to the proposed work:

1. All efforts must be made to avoid damage and/or disturbance of cultural heritage material along the offshore cable routes.
2. Should any shipwreck or cultural heritage material be detected below the high water mark via sonic scanning or other means, the position must be recorded and SAHRA must be notified immediately. Work must cease and may not commence until feedback has been received from SAHRA.
3. It is noted that the southern shallow water alignment route is not preferred from an installation and operational perspective. If, however, circumstance change and the southern shallow water alignment is used, the anomaly identified at 33°44.500'S, 18°22.000'E must be assessed. If the anomaly is found to be a shipwreck, an Impact Assessment Report must be submitted to SAHRA in terms of Section 38(2) of the Act. SAHRA must be provided opportunity to comment on the Report before work may commence.
4. If shipwreck or cultural heritage material detected along the offshore alignments is proven or suspected to be older than 60 years, a permit shall be required from SAHRA before work may commence.

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5. Comment regarding actual or potential heritage impacts above the high water mark must be sought from the Provincial Heritage Authority (Heritage Western Cape).
  6. Additional information regarding the wreck or anomaly must be provided. Specifically, the name of the vessel (if known), any associated chronological data, and the sources for this information must be provided.
  7. The section stating "SAHRA is the relevant heritage authority for all heritage resources located under the low water mark" (p. 31 of the DSR) must be amended to reflect that SAHRA's remit extends 24 Nautical miles seaward from the high water mark.
  8. The locality information for the entirety of each offshore cable route alternative must be uploaded to SAHRIS in .kml format.
  9. The pending heritage impact assessment must evaluate each of the alternative offshore route options.
  10. All documentation relevant to the application must be uploaded to the case on SAHRIS. Please note that SAHRA does not accept emailed documents or hard copy documents 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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Lesla la Grange  
Heritage Officer  
South African Heritage Resources Agency

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John Gribble  
Manager: Maritime and Underwater Cultural Heritage Unit / Acting Manager: Archaeology, Palaeontology and Meteorites Unit  
South African Heritage Resources Agency

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**ADMIN:**

Direct URL to case: <http://www.sahra.org.za/node/374934>

**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.