The Freshwater Consulting Group

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Department of Water and Sanitation
Western Cape Regional Office (Bellville)
c/o Claret Walker

To whom it may concern

RE: Risk Assessment Matrix for a proposed marine telecommunications cable system to be landed at Van Riebeekstrand on the west coast of South Africa

In September 2016, the Freshwater Consulting Group (FCG) completed a Freshwater Ecology Impact Assessment Report for the proposed marine telecommunications cable system (ACE Cable System) to be landed at Van Riebeekstrand and terminating at the MTN Cable Landing Station in Duynefontein on the West Coast of South Africa. This report was completed for the Environmental Authorisation process being coordinated by ACER (Africa) Environmental Consultants in terms of the 2014 Environmental Impact Assessment (EIA) Regulations of the National Environmental Management Act (Act No. 107 of 1998) (NEMA), on behalf of the proponent.

In addition to the Environmental Authorisation required in terms of the NEMA EIA Regulations, the proposed cable system triggers the need for Water Use Authorisation (WUA) in terms of the National Water Act (Act No. 36 of 1998) (NWA). In particular, due to the presence of wetlands within 500 m of the proposed cable routes, a WUA is required for impeding or diverting the flow of water in a watercourse, and/or altering the bed, banks, course or characteristics of a watercourse (i.e. Section 21 (c) and (i) "water uses"). In terms of the recently revised General Authorisation (GA) for Section 21 (c) and (i) water uses (Government Notice No. 509 of 26 August 2016), to avoid a full Water Use License Application, it must be demonstrated that proposed activities within the “regulated area of a watercourse” (including a 500 m radius from the delineated boundary of any wetland) would be of low risk to the resource quality of the watercourse through the completion of a “Risk Matrix” by a suitably qualified professional registered with SACNASP. The applicant must also verify that adequate provision has been made for the management, rehabilitation and monitoring of the affected watercourses, amongst other provisions.

FCG were appointed by ACER (Africa) Environmental Consultants to coordinate the WUA application process on behalf of the proponent. Part of this process involved the completion of the above-mentioned Risk Matrix for Section 21 (c) and (i) water uses for the proposed activities.

The Risk Matrix, which accompanies the current letter, was filled in by Dean Ollis (*Pr.Sci.Nat.*) and Tumisho Ngobela (*Cand.Sci.Nat.*) of FCG on the basis of the findings presented in our Freshwater Ecology Impact Assessment Report. As such, it is important to read the report of September 2016 in conjunction with the Risk Matrix. To ensure that the outcome of the Risk Matrix aligned with the findings of our specialist assessment, some of the scoring in the Risk Matrix did not strictly follow the scoring guidelines provided by the Department. Specifically, the intensity scores assigned to the possible encroachment of the proposed Cable Landing Station and part of the cable into an artificial wetland identified by FCG at the eastern end of the route were not the maximum of 5 for the various components (flow regime, water quality, habitat and biota), as recommended for any activities within a wetland by the scoring guidelines, because of the artificial nature and very low

conservation importance of the wetland in question. In the case of the dune slack wetland that could potentially be impacted by the proposed project, the impacts were predicted to be of relatively low intensity if the proposed mitigation measures are followed. This is because the implementation of the mitigation measures would ensure that the proposed activities are restricted to existing infilled pathways through the wetland.

The outcome of the Risk Matrix, as filled in by FCG, was that the proposed activities for both route options under consideration (Alternatives A and B) would be of low risk to freshwater ecosystems ("watercourses") if the proposed mitigation measures are properly implemented. As such, this implies that the proposed activities fall under the ambit of the relevant GA, provided all the standard conditions of authorisation are adhered to. This aligns with the overall conclusion of our Freshwater Ecosystems Impact Assessment, namely that all of the potentially negative impacts on freshwater ecosystems associated with the proposed ACE cable system would be of very low significance or would be avoided altogether with proper implementation of the recommended mitigation measures.

Alternative A is considered to be marginally preferable to Alternative B for the protection of freshwater ecosystems because there would be less risk of losing Cape Flats Dune Strandveld vegetation within the few remaining patches of intact natural vegetation associated with the dune slack wetland during the cable installation if this route alternative was followed. On the other hand, Alternative B would still be acceptable from a ecological perspective, provided all the proposed mitigation measures (as outlined in our September 2016 report) are properly implemented under the guidance of an Environmental Control Officer (ECO).

If any spoil material, including excavated soil, is going to be temporarily stockpiled within 10 m of the dune slack wetland during the cable installation, a Method Statement should be submitted to DWS for approval together with the WUA application. In addition, as recommended in our report, one of the conditions of authorisation that DWS should ensure is written into the Environmental Authorisation that is to be issued in terms of NEMA is that the dune slack wetland should be inspected on a regular basis (at least weekly) by the ECO for signs of disturbance, sedimentation and pollution during the construction phase for the section of the cable that would traverse this wetland. If signs of disturbance, sedimentation or pollution are noted, immediate action should be taken to remedy the situation and, if necessary, a freshwater ecologist should be consulted for advice on the most suitable remediation measures.

Please do not hesitate to contact me if you have any queries about the filled-in Risk Matrix, or if you wish to discuss the findings of our assessment or our recommendations.

Yours sincerely

Dean Justin Ollis *Pr.Sci.Nat.*

Attached:

(1) Completed Risk Matrix for proposed Van Riebeekstrand ACE Cable Installation - Alternative A

(2) Completed Risk Matrix for proposed Van Riebeekstrand ACE Cable Installation - Alternative B