



an agency of the  
Department of Arts and Culture

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South African Heritage Resources Agency | 111 Harrington Street | Cape Town  
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CaseID: 10322

Date: Wednesday May 03, 2017  
Page No: 1

## Interim Comment

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

Attention: ACER (Africa) Environmental Management Consultants

Suites 5 & 6, Golden Penny Centre  
26 Hely Hutchinson Street, Mtunzini  
KwaZulu-Natal, 386

**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) telecommunication 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, trigger Section 38 of the National Heritage Resources Act (No. 25 of 1999).

SAHRA thanks the applicant for taking the recommendations of the response to the Notification of Intent to Develop (NID) into account, and for the opportunity to comment on the Heritage Impact Assessment (HIA) and Draft Environmental Impact Assessment Report (DEIAR). The following specific comments on the documents and the proposed works are applicable:

1. Although the HIA states that “no impacts are expected to underwater cultural heritage resources,” all efforts must be made to avoid damage and/or disturbance of unknown cultural heritage material along the offshore cable routes during all activities involved in this work.
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. 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.
4. Where the submarine cable will lie on the seabed or be buried beneath it, the geophysical, side scan sonar, multi-beam, and sub-bottom profile data must be consulted in detail before clearing the area of debris, and laying or burying the cable, to ensure that no cultural heritage resources will be affected. If anomalies are detected, the placement of the cable must be adjusted to avoid these.

Our Ref:



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5. It is noted that the wreck of the *Rooibok* (1973) was suspected to lie at approximately 33°44.500' S, 18°22.000' E, but was not verified during survey. Cable-laying activities in within 50 meters of this area should however, still take care to avoid the wreck

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

**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.