

PROPOSED MARINE TELECOMMUNICATIONS SYSTEM (EQUIANO CABLE SYSTEM) TO BE LANDED AT MELKBOSSTRAND ON THE WEST COAST OF SOUTH AFRICA

Our Ref:



an agency of the
Department of Arts and Culture

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Date: Wednesday October 02, 2019
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Interim Comment

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

Attention: Telkom Openserve and ASN

Submarine telecommunications cables are important for international telecommunications networks, transporting almost 100% of transoceanic internet traffic throughout the world (www.iscpc.org). This is significant because it is widely recognised that access to affordable international bandwidth is key to economic development in every country. The purpose of this project is to install a fibre optic submarine cable to provide international high-speed connectivity and reliability. Businesses and consumers will benefit from enhanced capacity and reliability for services such as telecommuting, HD TV broadcasting, internet services, video conferencing, advanced multimedia and mobile video applications. Internet traffic is growing exponentially as the appetite for new applications, like cloud computing and on-demand video, increases. Furthermore, the demand for new connectivity reflects an end-user and business environment in which high capacity data transmission is essential for sustainable growth and development. Communication via submarine telecommunications cables generally allows for lower cost, better performance and greater capacity (throughput) than that available via satellite. Improvement in Africa's information technology infrastructure via telecommunications cables will help strengthen development in Africa and support economic growth and opportunities on the continent. Telkom SA SOC Limited, acting through its Openserve division (hereafter referred to as "Openserve"), intends to install a submarine telecommunications cable, called the Equiano Cable System, to link South Africa with key international telecommunications hubs in West Africa (Nigeria) and Europe (Portugal). As the designated Landing Partner of the Equiano Cable System in South Africa, Openserve has the required licenses to operate this system in South Africa and aims to secure local permits to land the Equiano Cable System at Melkbosstrand, Western Cape. Alcatel Submarine Networks (ASN) has been appointed as the supplier and installer of the Equiano Cable System connecting Africa and Europe. The system is to be installed in phases. The first phase ("Baseline System") will entail the installation of cable landings at: ? South Africa: Melkbosstrand. ? Portugal: Lisbon (Sesimbra). ? Nigeria: Lagos. Through the Equiano Cable System, Openserve will facilitate more affordable and effective transport of voice, data, internet and television services in South Africa. Furthermore, the cable will support the objectives set out by the New Partnership for Africa's Development (NEPAD) and provide a means of fulfilling the South African Government's requirements in terms of digital television broadcasting in the country. The Equiano

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Cable System will have an initial design capacity of up to 200 Terabits per second. Environmental Legislation The current Environmental Impact Assessment Regulations, 2014 (as amended 2017) published under Section 24(5) read with Sections 24, 24D and 44 of the National Environmental Management Act, 1998 (Act No. 107 of 1998) (as amended) apply to this project. Based on these regulations, the Environmental Assessment Practitioner (EAP) must complete Scoping and an Impact Assessment within 300 days of acceptance of the Application for Authorisation by the competent authority, viz. the national Department of Environment, Forestry and Fisheries (DEFF). DEFF is the competent authority for the issuing of environmental authorisation because the Equiano Cable System traverses' international boundaries. It is also envisaged that a Water Use Licence may be required from the Department of Human Settlements, Water and Sanitation in terms of Chapter 4 of the National Water Act, 1998 (Act No 36 of 1998), particularly Section 40(4). On behalf of Openserve and ASN, ACER will fulfil the role and responsibilities of EAP, undertaking the Environmental Impact Assessment (EIA), the associated public participation process, and submitting the required application and supporting documentation to DEFF for consideration and decision-making. The purpose of this letter is to invite you, as a potentially Interested & Affected Party to participate in the EIA. A Background Information Document (Appendix 1) and Comment Sheet (Separate Attachment) have been compiled and are provided herewith to facilitate your participation (these documents are also available at www.acer africa.co.za under the "Current Projects" link (Equiano Cable System)). Please note that the closing date for initial comments¹ during public announcement is 22 October 2019. ACER (Africa) Environmental Consultants Carina Boonzaaier or Giles Churchill P O Box 503, Mtunzini, 3867 Tel: 035 340 2715 Fax: 035 340 2232 E-mail: equiano@acer africa.co.za

The South African Heritage Resources Agency would like to thank you for submitting the Background Information Document (BID) for the proposed Marine Telecommunications System to be landed at Melkbosstrand on the West coast of South Africa.

As part of the Environmental Authorisation process a Scoping Report and Environmental Impact Assessment (EIA) must be completed. The BID has already identified that a Heritage Assessment is to be undertaken as part of the process.

In terms of the National Heritage Resources Act, No 25 of 1999 (NHRA), Sections 2 and 35 stipulates that any wreck, being any vessel or aircraft or any part thereof older than 60 years old lying in South Africa's territorial waters or maritime cultural zone is protected and falls under the jurisdiction of SAHRA's Maritime and Underwater Cultural Heritage Unit. These heritage sites or objects may not be disturbed without a permit from

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the relevant heritage resources authority.

The proposed cable runs to the north of both Robben Island and Table Bay, historically both of these areas have seen a high volume of maritime traffic and casualties. There are a number of vessels which are recorded as lying along the route of the proposed cable though it must be noted that the co-ordinates for the wrecks may not be accurate.

In the area of the cable landing site there is one wreck listed as lying within the bay close to the proposed site, the French vessel L'Lucie is recorded as wrecking in 1808 in Losperds Bay which is modern day Melkbosstrand. Melkbosstrand was also the landing place for the British troops involved in the Battle of Blaauwberg in 1806.

Due to the possibility that heritage resources may be present along the proposed route of the cable, the heritage assessment must include a specialist study of maritime heritage to be undertaken by a suitably qualified Maritime Archaeologist.

Should you have any further queries, please contact the designated official using the case number quoted above in the case header.

Yours faithfully

Briege Williams
Heritage Officer
South African Heritage Resources Agency

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Lesla la Grange
Acting Manager: Maritime and Underwater Cultural Heritage
South African Heritage Resources Agency

ADMIN:

Direct URL to case: <http://www.sahra.org.za/node/528799>

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.