



16 March 2020

ACER (Africa) Environmental Consultants
P O Box 503
MTUNZINI
3867

Attention: Mr Giles Churchill

(e-mail: equiano@acerafrica.co.za)

Dear Sir

PROPOSED MARINE TELECOMMUNICATIONS SYSTEM (EQUIANO CABLE SYSTEM) TO BE LANDED AT MELKBOSSTRAND, SOUTH AFRICA – DRAFT SCOPING REPORT

The Background Information Document (BID), dated 18 September 2019, this office's previous letter, dated 22 October 2019, and the Draft Scoping Report (DSR), dated February 2020, refers.

1. The comment raised by the City of Cape Town, dated 22 October 2019, has adequately been reflected in Appendix 3: *Comments & Responses Report* of the DSR.
 - a. The EAP's response of "Noted" against a number of very detailed City requested mitigation measures is however problematic. "Noted" is an inappropriate and vague response that does not indicate/clarify whether EAP intends to take the matter forward.
 - b. For example the request for the inclusion of an Oil Spill Contingency Plan in the draft CEMPr is not properly acknowledged/addressed by merely stating "Noted". The opinion is held that a more appropriate response is: "The need for an Oil Spill Contingency Plan will be included in the Proposed Plan of Study and draft CEMPr"
 - c. The EAP is requested to re-visit the City of Cape Town's comment to identify specific requested deliverables and include/address the abovementioned suggested response against each deliverable where needed.
2. The proposed *Plan of Study* for the EIA stage, including the proposed specialists' Terms of References (ToR), listed in Section 9 of the report is considered sufficient.
 - a. It is acknowledged that a standard ToR requesting "Address specific issues and concerns raised by I&APs" is included under each specialist, however it is cautioned that this might lead to deliverables/items being overlooked. In light of point 1(b) above, the final Scoping Report should list the specific deliverables/items under the relevant specialist's ToR.
3. General (typing/grammar errors and corrections)
The general information provided below are mere examples of amendments to be made in the DSR. For the purpose of this letter, illustrations are provided.
 - a. Page 31, reference number 12 in the description relating to ecological integrity by providing alternatives that will be of the "best ~~practicable~~ should be **(practical)** environmental option".
 - b. Page 38, Chapter 5, under 'Project Description', the word "and" is repetitive in describing what this Chapter entails. Commas or semi-colons are suggested to separate the compound sentence.

- c. Page 54, Grammatical error: replace `to' with `on' in order to read "The alignment was followed to minimise the impact of the Equiano Cable System ~~to~~ **(on)** other seabed users..."
- d. Page 95, key point 2, bullet point 1, referencing to "exotic and ~~invader~~ should be **(invasive)** species".
- e. There are numerous examples of tautology used in the DSR, for example, on page 38 the DSR mentions that "the cable will be buried in sediment wherever possible to avoid **obvious visible** rock". Similarly, on page 39, "the protective encasement of the cable in the articulated iron pipe shells will make it **very heavy**". The emphasis `obvious' and "very" is not needed.

The City of Cape Town now awaits the Competent Authority's decision on the proposed *Plan of Study* for the EIA phase and thereafter a copy of the draft Environmental Impact Assessment Report (EIR).

The said draft EIR must be submitted to this office in the form of 1 hard copy and 1 electronic CD/flash disk version.

Yours faithfully



PAT TITMUSS

Head: Environmental Management Department: Environmental & Heritage Management Branch - Northern Region