

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

PROJECT NOTIFICATION (18 SEPTEMBER 2019 – 10 NOVEMBER 2019)

COMMENTS AND RESPONSES REPORT

Name	Organisation
Dr Ernst Baard	CapeNature (Executive Director: Biodiversity Support)
Ms Roelda Brown	Senior Librarian – Koeberg Library
Mr Henry Camp	I&AP
Mr Basson Geldenhuys	Department of Public Works
Ms Daisy Kotsedi	Department of Environment, Forestry & Fisheries (Oceans & Coasts)
Ms Lesa La Grange	Manager – SAHRIS (South African Heritage Resources Information System)
Mrs Smokie La Grange	Chairperson – Melkbosstrand Ratepayers Association
Ms Adri La Meyer	Department of Environmental Affairs – Western Cape
Mr Xolani Myanga	Department of Environment, Forestry & Fisheries (Oceans & Coasts)
Mr Peter Mohasoa	Department of Mineral Resources
Dr Ane Oosthuizen	SANParks – National Marine Co-ordinator
Mr Marek Ranzoszek	Anadarko South Africa (Pty) Ltd
Mr Andrew September	Heritage Western Cape – Archaeology
Mr Rhett Smart	CapeNature Scientific Services
Mr Morne Theron	City of Cape Town – Spatial Planning & Environment Directorate
Ms Pat Titmuss	City of Cape Town - Spatial Planning & Environment Directorate
Ms Nontsana P Tonjeni	Department of Environment, Forestry & Fisheries (Oceans & Coasts)
Ms Briege Williams	Case/Heritage Officer – SAHRA
Mr Deon Durholtz	Dept. Environmental Affairs, Fisheries Research & Development
Mr Jarrett Whitehead	Norton Rose Fulbright South Africa Inc

Name and Organisation	Comment	Response
<p>Date: 26.08.2019 (Email) Marek Ranoszek – Anadarko South Africa (Pty) Ltd</p>	<p>Thanks for your email below giving me a heads up on the proposed environmental authorisation process for the SA branch of the Equiano Cable System. In answer to your questions.</p> <ul style="list-style-type: none"> • Yes, I am the correct person to add to the project database. • Please add the following people; Eddie Borden, eddie_borden@oxy.com and Fiona Kilbride, fiona_kilbride@oxy.com <p>Please note that Anadarko is now part of Oxy, however, Anadarko South Africa (Pty) Ltd remains the license holder for Block 5/6/7.</p> <p>Rhino Resources – Phillip Steyn, psteyn@rhinoresourcesltd.com Impact Oil & Gas - Keely Harris, k.harris@impactoilandgas.com Sezigyn - Solomon Lephoto, solomon@sungusungugroup.com</p>	<p>Thank you for your assistance. We have added Mr Borden and Ms Kilbride to the project database.</p>
<p>Date: 19.09.2019 (Email) Lesla La Grange – Manager and Briege Williams (Case Officer) SAHRIS</p>	<p>In order for us to issue a comment on the project, you will need to create a case on SAHRIS and upload the relevant documents. Once you have done this, please contact me and I will assign myself as case officer and issue a comment.</p> <p>The link to SAHRIS is https://sahris.sahra.org.za/ Please contact me if you have any queries.</p> <p>Date: 19.09.19 (Email) – Briege Williams (Case Officer) Thanks for your email, I have now assigned myself as case officer and will issue a comment in due course.</p> <p>Date: 19.09.19 (Email) I am just looking at the case and note that there is nothing under the location tab. Could you please upload a KML for the route of the cable and then I will be able to plot it on our GIS system to see if it runs near any shipwrecks.</p> <p>Thank you for uploading the location.</p>	<p>Noted. We have loaded all the documents onto the SAHRIS link. The Application date: Thursday 19 September 2019, Case ID:14348, Consultants/Experts.</p> <p>ACER uploaded the KML to SAHRIS as requested.</p>
<p>Date: 19.09.2019 (Email) Roelda Brown – Senior Librarian (Koeberg Library)</p>	<p>I have printed the attached documents and made it available to the public for their input. We would not, however, be able to print large documents as our budget is limited.</p>	<p>Thank you for printing the background information document. ACER will print and submit larger documents to the library for I&AP review purposes.</p>
<p>Date: 19.09.2019 (Email) Mrs S La Grange Chairperson Ratepayers Association</p>	<p>The Melkbosstrand Ratepayers Association is already registered as an I&AP and has been participating in the EIA process for the last five years. We really appreciate the information received. Please continue to keep us informed.</p> <p>Chairperson - Melkbosstrand Ratepayers Association Ward 23 Representative - Civic Organisations.</p>	<p>Noted. Please be aware that this is a new EIA process for a new proposed submarine telecommunications cable, namely the Equiano Cable System.</p>

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<p>Date: 20.09.2019 (Email) Adri La Meyer Department of Environmental Affairs Western Cape</p>	<p>Thank you for the e-mail. I doubt that the commenting directorates will have any prelim comments on the BID but will forward it to them for their potential comment by 22/10/2019. If not, then we will definitely provide comment on the DSR. I will be responsible for collating comments during the formal EIA process.</p> <p>Please provide me with 1 hard copy (if possible) and 3 CDs of the DSR and EIAR when available.</p>	<p>Noted, we will send the required documents as requested.</p>
<p>Date: 27.09.2019 (Email) Peter Mohasoa Regional Manager: Mineral Regulation Department of Mineral Resources</p>	<p>COMMENTS ON THE PROPOSED MARINE TELECOMMUNICATION SYSTEM (EQUIANO CABLE SYSTEM) TO BE LANDED AT MELKBOSSTRAND ON THE WEST COAST OF SOUTH AFRICA</p> <p>The letter addressed to the Department of Mineral Resources Western Cape Regional Manager on the subject matter bears reference.</p> <p>Thank you for your consultation with the Department of Mineral Resources (the "Department") about the proposed development. The Department has a number of offshore mining applications and rights in the broader Exclusive Economic Zone and along the west coast of South Africa. In order to provide constructive inputs, please provide the geographical location (GIS shapefiles) of the proposed development. The Petroleum Agency of South Africa is another leading role player in the marine development space in terms of oil and gas exploration. It is, therefore, advisable that you extend the invitation for comments to them.</p>	<p>The comments provided by DMR are noted and will be incorporated into the environmental assessment documentation.</p> <p>Shape files were emailed to Mr Mohasoa on 18.09.2019.</p> <p>PRASA was added to the project data base and project announcement material was emailed on 07.10.2019.</p>
<p>Date: 30.09.2019 (Email) Henry Camp – I&AP</p>	<p>Please add my name to the list of I&APs.</p>	<p>Mr Camp was added to the project database.</p>
<p>Date: 02.10.2019 (Email) Briege Williams Heritage Officer SAHRA</p>	<p>Interim Comment Case ID: 14348 In terms of Section 38(8) of the National Heritage Resources Act (Act 25 of 1999) <u>Attention:</u> Telkom Openserve and ASN</p> <p>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.</p> <p>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.</p>	<p>Thank you for your email and comments. A Heritage impact assessment will be conducted in both the onshore and offshore environments.</p>

Name and Organisation	Comment	Response
	<p>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 the relevant heritage resources authority.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>Should you have any further queries, please contact the designated official using the case number quoted above in the case header.</p>	
<p>Date: 02.10.2019 (Email) Andrew September Heritage Western Cape (Archaeology)</p>	<p>You will be required to submit a NID application for the land section of the proposed cable installation. See our website for more details on the process of submission: https://www.hwc.org.za/making-an-application https://www.hwc.org.za/node/90</p>	<p>Noted, a NID application will be submitted by the appointed Heritage Specialist during the impact assessment phase of the Environmental Authorisation process.</p>
<p>Date: 07.10.2019 (Email) Nontsasa Tonjeni Department Environment, Forestry and Fisheries (Oceans & Coasts)</p>	<p>I have tried to contact your office. Kindly be advised that we have received the above-mentioned today (07/10/2019) with an invitation to provide comments and participate in the process as the I&AP. This was given to us by Dr Alan Boyd. Kindly be advised that for future correspondence re-EIA application requests for comments please contact me and Ms Funanani Ditinti at fditinti@environment.gov.za and Mr. Xolani Myanga at XMyanga@environment.gov.za</p>	<p>Noted, all future correspondence will be sent to Ms Nontsasa, Ms Ditinti and Mr Myanga as requested.</p>

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	Please forward us relevant information/documentation regarding the above-mentioned so we can provide our comments/inputs.	
<p>Date: 08.10.2019 (Email) Xolani Myanga Department of Environment, Forestry and Fisheries (Oceans & Coasts)</p>	<p>Kindly find attached the Background Information Document Response Letter on the Proposed Project.</p> <p>Attached Letter</p> <p>SUBJECT: COMMENTS ON THE BACKGROUND INFORMATION DOCUMENT (BID) ON THE PROPOSED INSTALLATION OF A SUBMARINE TELECOMMUNICATIONS CABLE (EQUIANO CABLE SYSTEM) IN MELKBOSSTRAND, WESTERN CAPE TO LINK SOUTH AFRICA AND THE WEST COAST OF AFRICA WITH KEY INTERNATIONAL TELECOMMUNICATIONS HUBS IN EUROPE</p> <p>This letter serves to acknowledge receipt of the Background Information Document on the proposed installation of a submarine telecommunications cable (Equiano Cable System) in Melkbosstrand. Western Cape to link South Africa and the West Coast of Africa with key international telecommunications hubs in Europe. The Department of Environment, Forestry & Fisheries (DEFF) in its Branch Oceans & Coasts appreciates the opportunity given to comment on this proposed project and further requests to be registered as an I&AP.</p> <p>The Department has reviewed the Background Information Document in terms of the National Environmental Management: Integrated Coastal Management Act, 2008 (Act No. 24 of 2008) ("ICM Act") and further notes that the proposed development activities could have potential Impacts on the coastal zone. As such, the department will provide comments on the next public participation stage of this application.</p> <p>Kindly note that the department reserves the right to revise its initial comments and may request further information. It is, therefore, a recommendation of DEFF: O&C that the EAP provides confirmation that the above-mentioned project is in the Background Information Document phase. All future correspondence and documentation (hard copy and electronic documents) submitted to this office should be addressed to Xmyanga@environment.gov.za Physical Address: Department of Environment, Fisheries and Forestry Branch: Oceans and Coast, 2 East Pier Building, East Pier Road, Victoria and Alfred Waterfront, Cape Town, 8001.</p>	<p>Thank you for your comments. We confirm that the EIA process is in the public notification phase.</p> <p>Noted.</p> <p>Noted.</p> <p>Noted.</p>

Name and Organisation	Comment	Response
	<p>Date: 09.10.2019 (Email) Thank you for the confirmation. We will await the draft scoping report and provide you with comments within the specified timeframe.</p>	Noted.
<p>Date: 23.10.2019 (Email) Morne Theron/Pat Titmuss City of Cape Town Spatial Planning & Environment Directorate</p>	<p>PROPOSED MARINE TELECOMMUNICATIONS SYSTEM (EQUIANO CABLE SYSTEM) TO BE LANDED AT MELKBOSSTRAND, SOUTH AFRICA - BACKGROUND INFORMATION DOCUMENT</p> <p>The Background Information Document (BID), dated 18 September 2019, pertaining to the above, refers.</p> <p>According to the BID the project entails the laying of a new fibre optic submarine cable that makes landfall opposite 14th Avenue, Melkbosstrand (at Erf 610).</p> <p>From there the existing on-land sleeves will be used to pull the new cable to the Cable Landing Station at Erf 438, Melkbosstrand.</p> <ol style="list-style-type: none"> 1. Kindly register the Environmental Resource Management Department: Blaauwberg District as the official City of Cape Town entry point for comment on the aforementioned EIA. Be advised that the Environmental Management Department (EMD) is the duly mandated department to provide co-ordinated City comment on EIAs conducted within the municipality's jurisdiction. As Melkbosstrand falls within the Blaauwberg District of the City of Cape Town all future reports must be submitted to this office for comment. 2. In order for the City to meet the statutory commenting deadline(s) you are required to timeously submit electronic copy (i.e. flash disk) and 1 x hard copy of the various Environmental Impact Assessment reports to this office before EMD can circulate the draft reports to all our affected line departments. The public participation commenting period will be calculated from the date that this office receives the flash disk and hard copy. As such please ensure that the necessary documentation is delivered to our physical address as stated below. 3. In the interim the following comment is provided based on the information provided in the BID: 	<p>Thank you for your email and comments.</p> <p>Noted, all future reports will be submitted to the Environmental Management Department (EMD) for comment.</p> <p>Noted and we will submit the documents as requested.</p>

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	<p>3.1. Community Services & Health Directorate - Recreations & Park</p> <p>3.1.1 Be advised that Melkbos is a Blue Flag Beach. As such no construction is to take place between the 1st December and 31st March of any year. If construction is indeed envisaged for the aforementioned period, the City Recreations & Park department must be informed as soon as possible as the City has an obligation to inform Blue Flag International accordingly. Normally international Blue Flag status stipulates that no construction is to be allowed during the peak season.</p> <p>3.1.2 As such construction/installation during peak holiday season should not be permitted. In addition, the applicant must advise the City of Cape Town what time of the year construction/installation will commence in order to ensure that it does not clash with major events during the same period.</p> <p>3.1.3. A Rehabilitation plan (including a schedule of when rehabilitation will take place) is required for all areas affected by the proposed trenching. This includes the section along 14th Avenue towards the Cable Landing Station. Affected infrastructure, including street trees (if affected), should be clearly identified.</p> <p>3.1.4. Post-construction maintenance requirements of the cable must be specified in the Scoping report. If needed post-construction maintenance requirements must be included in the Environmental Management Programme that takes cognisance of the following information:</p> <ul style="list-style-type: none"> • The position of the Beach Manhole (BMH) is close to the only recognised bathing area in Melkbos. • The cable will also be in proximity to a gazetted public boat launch site. Due to the high kelp load that exists in the inshore zone, it is already a congested area, with boats often traversing the bathing area as they navigate their way around the kelp. • 14th Avenue is the informal border between the bathing area (south) and non-bathing area (north), therefore it depends on whether or not the cable is laid north or south of 14th Avenue 's east-west alignment. <p>3.1.5. Ensure that the Ecological Assessment includes a zoological assessment. If not, then a fauna specialist would need to be included in the list of proposed specialist assessments/studies.</p>	<p>Noted, the Recreation and Parks Department will be notified at least three months prior to construction commencing and landing of the cable will be scheduled to take place outside of the peak holiday season.</p> <p>The Recreation and Parks Department will be notified at least three months prior to construction commencing and landing of the cable will be scheduled to take place outside of the peak holiday season.</p> <p>Noted, a rehabilitation plan will be compiled outlining the affected areas and a schedule for rehabilitation. Please note that no trenching inland of the BMH is required along 14th Avenue.</p> <p>Post construction maintenance will be undertaken by Telkom (Openserve) in line with what they are currently undertaking for the SAT-2 infrastructure. This relates purely to equipment maintenance.</p> <p>Noted although this BMH has been in this location since 1993.</p> <p>Noted. The Equiano cable will have no impact on the launch site as the cable will be buried below the seabed and not obstruct or pose a safety risk to the movement of small vessels.</p> <p>Noted. The Equiano cable will have no impact bathers as the cable will be buried below the seabed and not obstruct or pose a safety risk to bathers.</p> <p>Noted. This has been included in the terms of reference for the specialist study.</p>

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	<p>.1.6. The section of the Melkbosstrand beach where the cable trenching is being proposed is being severely eroded. It is important not to exacerbate this situation during construction. Alternatively, the CEMPr must include the need for a Dune Vegetation Rehabilitation Plan to the satisfaction of the City of Cape Town: Recreation & Parks Department (Recreation & Parks contact person: Ms Cythna Engelbrecht).</p> <p>3.1.7. Oil Spill Contingency Plans must be included on the draft Construction Environmental Management Programme (CEMPr). The Terms of Reference to the specialist compiling the Oil Spill Contingency Plans needs include the risk of spillages - albeit small and/or unlikely - from both the cable-laying ship and the excavation machinery.</p> <p>3.1.8. The CEMPr must acknowledge that Drowning Prevention infrastructure (temporary) is located to the immediate south of 14th Avenue.</p> <p>3.1 Spatial Planning and Environment Directorate: Coastal Management Branch</p> <p>The Coastal Management Branch (CMB) requires that the following points are addressed in the Environmental Assessment and appropriately mitigated:</p> <p>3.2.1. Cape Town's beaches are highly dynamic spaces, with beach profiles fluctuating significantly both seasonally and after discreet events such as storm surges. We have had incidents in the past where cables of similar nature along the same stretch of coast have been exposed which can become problematic for a number of reasons, namely:</p> <ul style="list-style-type: none"> • Health and safety concerns for the public. • Aesthetic impacts. • Additional earth works to re-bury cables to deeper depths, all of which may lead to additional environmental impacts and further disruptions to both the public and City. <p>In view of this the CMB requests that every measure is taken to ensure that the cable is buried to a depth that guarantees it will not be exposed at any point into the future.</p>	<p>Noted. A rehabilitation plan will be submitted to the City of Cape Town for approval.</p> <p>An oil spill contingency plan will be included in the Environmental Management Programme (EMPr). It is unlikely that a specialist will be appointed to draft this plan as the project does not involve any major construction (mitigation measures for hydrocarbon leaks from machinery will be addressed in the EMPr).</p> <p>Noted. The EMPr and Beach Driving Permit application will acknowledge that Drowning Prevention infrastructure (temporary) is located to the immediate south of 14th Avenue.</p> <p>Your concerns are noted, and every effort will be made to ensure the health and safety concerns of the public, aesthetic impacts and where sand profiles allow, the cable will be buried to a depth of 2 m. This will prevent cable exposure should the beach profile change as occurred with the ACE cable on Van Riebeeckstrand Beach in 2018.</p>

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	<p>3.2.2. As indicated in the BID the proposed landing area is a popular recreational and amenity area abutted by both public infrastructure (roads/parking/walkways) as well as private infrastructure (residential development). In this regard the CMB requests that the landing of the cable takes place outside of school holidays and festive season to minimize disruption.</p> <p>There is a grassy verge/low embankment between the beach and road. Whilst a narrow strip, it does provide an important transitional substrate between the beach and roadside parking. Any activities that lead to any negative impact/deterioration of this verge/embankment must be rectified by rehabilitative measures to return the embankment back to its original state.</p> <p>3.2.4. Should any changes be made to the proposed site or any changes/upgrades be necessary to ancillary landing infrastructure please notify the Coastal Management Branch in advance.</p> <p>3.2.5. Lastly, The Coastal Management Branch requests a site inspection with the contractor prior to the cable being landed to ensure the above issues are addressed. The draft CEMPr is to stipulate that Ms Natalie Newman at CMB is to be contacted at e-mail: Natalie.newmand@capetown.gov.za in this regard.</p> <p>3.3 Spatial Planning and Environment Directorate - Environmental Management Department</p> <p>3.3.1. Erf 610, Melkbosstrand, where the cable makes landfall at Melkbosstrand, is zoned Transport Zone 2 (Designated as a Community Park).</p> <p>3.3.2. The cable system is proposed in an area of high archaeological sensitivity. The length of the on-land trenching required in order to lay the proposed cable system over the beach towards the existing Beach Manhole (BMH), does not trigger Section 38(l)(a) of the National Heritage Resources Act, no 25 of 1999. However, from a precautionary approach, a Notification of Intent to Develop (NID) must still be submitted to Heritage Western Cape (HWC). Prior to submission to HWC, the NID must be submitted to the City of Cape Town: Environmental & Heritage Management Branch for written comment to be included in the submission to HWC. The abovementioned comment must be included in the draft Scoping Report.</p>	<p>The landing of the cable will be scheduled to take place outside of the peak season and school holidays.</p> <p>All damage to the grass embankment will be rehabilitated to the approval of the City of Cape Town.</p> <p>Noted.</p> <p>Noted, a site inspection will be scheduled prior to landing of the cable to ensure that the issues raised by the City of Cape Town have been addressed or are in place for the landing.</p> <p>Noted.</p> <p>The land-based infrastructure for the cable was installed in 1992 and no disturbance to the terrestrial environment is required for the landing of the Equiano Cable system. Heritage Western Cape will be consulted during the impact assessment to ascertain their requirements. Following the terrestrial Heritage Assessment HWC have confirmed that no NID need to be submitted as the terrestrial component of the project is less than 300 m in length (Email correspondence between Mr September from HWC and the heritage specialist, Mr Gribble from ACO-Associates). As such no NID will be submitted to the City of Cape Town:</p>

Name and Organisation	Comment	Response
		Environmental & Heritage Management Branch for written comment to be included in the submission to HWC.
Date: 25.10.2019 (Email) Daisy Kotsedi Department of Environment, Forestry & Fisheries (Oceans & Coasts)	Besides the EIA sub-directorate, kindly add myself, Siyabonga Dlulisa (sdlulisa@environment.gov.za) and Nqobile Hlophe (NHlophe@environment.gov.za) from the MPA sub-directorate. From Research, please add Steve Kirkman (SKirkman@environment.gov.za) and Liwalam Madikiza (Lmadikiza@environment.gov.za). From SANParks Ane Oosthuizen (Ane.Oosthuizen@sanparks.org) and Andre Riley (Andre.riley@sanparks.org).	Thank you for your input. We will make sure everyone is added to the project database and that they are kept updated of the EIA progress.
Date: 01.11.2019 (Email) Mr. Rhett Smart/Dr Ernst Baard CapeNature Scientific Services	As this is only at the BID stage, we will not provide detailed comment at this stage. We support the proposed specialist studies to be undertaken and do not recommend any additional specialist studies. Please see attached our standard letter of requirements for commenting on applications (to change shortly).	Thank you for this information.
Date: 04.11.2019 (Email) Dr Ane Oosthuizen SANParks National Marine Co-Ordinator	The Melkbosstrand area where the proposed landing takes place does not fall within an area managed by SANParks. Our closest national park is West Coast National Park, in Langebaan. I would suggest getting comment from CapeNature, the provincial conservation authority.	We have contacted CapeNature and have received correspondence from them.
Date: 06.11.2019 (Email) Mr Basson Geldenhuys Department of Public Works	Your email below has bearing. This email serves as confirmation that you had a meeting with me and informed me about the proposed activities and the EIA process. I have also been informed by post previously of the EIA process.	Thank you for meeting with ACER to discuss the proposed Equiano Cable System which will be landed at Melkbosstrand and then feed into the existing SAT-2 Beach Manhole located on the beach at Melkbosstrand. ACER has searched both the provincial and national environmental departments' websites and have established that landowner notification forms are no longer available on their websites. In view of this, please could we ask that you respond to this email stating that the EAP has engaged with the Department of Public Works (DPW) and that you as a landowner are aware of the project and will be kept informed throughout the EIA process.
Date: 18.11.2019 (Email) Jarrett Whitehead Norton Rose Fulbright South Africa Inc	Apologies in not coming back to you – somehow my response was caught in my outbox which I only just picked up! While I cannot speak for Seizgyn or Rhino, you may issue any correspondence or	ACER (Africa) Environmental Consultants (ACER) has been appointed by ASN to conduct the Environmental Authorisation process for the South African branch of the Equiano Cable System. We are hoping to advertise the project soon and

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	<p>communication to myself and Lizel Oberholzer in copy on behalf of Impact.</p> <p>Date: 19.11.2019</p> <p>Thank you for the information. We will be in contact as needed.</p>	<p>commence with the environmental authorisation process. The proposed cable route also passes through concession/exploration blocks held by Rhino Oil; Sezigyn (Pty) Ltd and Impact Oil & Gas Ltd. (UK).</p>
<p>Date: 17.12.2019 (Email)</p> <p>Mr Deon Durholtz</p> <p>Dept. Environmental Affairs</p> <p>Fisheries Research & Development</p>	<p>Gertie Swanepoel has forwarded me your email. Could you please add me to your database with regard to this project? My office phone number is (021) 402 3179, and you will now have my email address.</p>	<p>Thank you, we have added you to the project database.</p>

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

**DRAFT SCOPING REPORT REVIEW PERIOD (12 FEBRUARY 2020 – 16 MARCH 2020)
COMMENTS AND RESPONSE REPORT**

Name	Organisation
Mr Henry Camp	I&AP
Mr Gerhard Gerber	Department Environmental Affairs & Development Planning - Director: Development
Mr Eduard Groenewald	Total E&P South Africa B.V. (HSE Manager)
Ms Adri La Meyer	Department of Environmental Affairs – Western Cape
Mr Sabelo Malaza – Chief Director: Integrated Environmental Authorisations	Department Environment, Forestry and Fisheries
Ms Nozipho Mkhabela	I&J Limited – GIS technician
Ms Phumla Ngesi	Petroleum Agency SA - Environmental Compliance
Mr Prins Radebe	Telkom – Openserve (Senior Manager Global Capacity Business)
Ms Pat Titmuss	City of Cape Town – Head: Environmental Management Department

Name and Organisation	Comment	Response
Date: 12.02.2020 (Email) Ms Adri La Meyer Department of Environmental Affairs Western Cape	Thank you for the e-mail. I can confirm that I did receive the hard and electronic copies of the DSR. Thank you for that. We will provide comment by the deadline indicated.	Noted with thanks.
Date: 12.02.2020 (Email) Mr Henry Camp I&AP	Please find the completed form attached. I do not see the draft scoping report posted to your website yet. Could you please let me know when it is available?	Thank you for your email and comments. ACER notified Mr Camp when the website became available.
Date: 12.02.2020 (Email) Ms Nozipho Mkhabela I&J Limited GIS Technician	To aid in our commentary regarding the proposed submarine telecommunications cable, could you please send to me the shapefiles used to make the map below taken from the Draft Scoping Report ("on ACER's website: www.acerafrica.co.za under 'Projects – Current Public Review – Openserve Equiano Cable System"). Email: 13.02.2020 Thank you for the Equiano cable file. Could you kindly also share with me the files of all the other cables (ACE, etc.) displayed on the map?	Please see attached the Google Earth files as requested. If you need the alignment through deeper waters, please let ACER know.
Date: 14.02.2020 (Email) Ms Phumla Ngesi Petroleum Agency SA Environmental Compliance	Can I kindly receive shapefiles for the proposed cable route? We need to verify if it traverses any exploration or production right areas.	The kmz files for the Equiano Cable alignment were submitted as requested.
Date: 14.02.2020 (Email) Mr Prins Radebe Telkom - Openserve	Please find attached our comment and contribution to the scoping of the EIA for the proposed telecom system. I have not had access to the DSR and would appreciate an electronic version by email if that facility is available. Comments Proximity to other cables laid in the area. ICPC recommendations for cable crossing if there is to be a cable crossing: info exchange (i) route position list (ii) water depth (iii) crossing angle (iv) cable type (v) other laid/planned cables (vi) nearest repeater. Meaningful engagement of other sea users, fishermen and trawler associations.	Thank you for your comments. Please see the link below to access the electronic version of the Draft Scoping Report and supporting appendices which are on our website for public review https://acerafrica.co.za/current-projects-4/ Your comments have been noted and the cable installer (ASN) and the local landing partner (Openserve) are aware of the requirements in terms of cable crossings. All cable operators will be informed of any cable crossings prior to installation and the project team is engaging with other sea users, fishermen and trawler associations as part of the EIA consultation process.

Name and Organisation	Comment	Response
<p>Date: 17.02.2020 (Email) Mr Eduard Groenewald Total E&P South Africa B.V.</p>	<p>ENVIRONMENTAL IMPACT ASSESSMENT FOR THE PROPOSED MARINE TELECOMMUNICATIONS SYSTEM (EQUIANO CABLE SYSTEM) TO BE LANDED AT MELKBOSSTRAND ON THE WEST COAST OF SOUTH AFRICA</p> <p>We refer to the scoping report for the Environmental Impact Assessment for the proposed Marine Telecommunications System (Equiano Cable System) to be landed at Melkbosstrand on the West Coast of South Africa.</p> <p>Total E&P South Africa B.V. (TEPSA) currently holds offshore O&G exploration rights on the west coast of South Africa where some activities have already started for the exploration of hydrocarbons offshore. We have noted from your scoping report dated 18 September 2019, that activities of O&G industry are not listed under <i>Section 6 – Potential issues associated with the proposed Equiano cable system</i> nor under <i>Section 7.1 – Technical Activities</i>.</p> <p>We would like for you to consider the activities of O&G exploration and future possible offshore and subsea infrastructure development for O&G production facilities (including possible pipelines) in your impact assessment.</p> <p>A detailed map of the offshore exploration rights along the west coast can be obtained from the Petroleum Agency of South Africa.</p> <p>Furthermore, we would like to be registered as an Interested and Affected Party for this specific project as follows:</p>	<p>Thank you for your email and comments. We have registered you as an Interested and Affected Party for the project.</p> <p>The proposed alignment for the Equiano Cable System will follow the existing SAT-2 alignment and, as such, this cable corridor and associated buffer have been in place since 1993. The Equiano cable will not result in any further exclusions (through legislated buffers) to the O&G Industry for this development.</p> <p>The possible impacts on O&G exploration and future possible offshore and subsea infrastructure for O&G production facilities have been included in the Final Scoping Report. To mitigate impacts on the O&G industry, it is recommended that the cable landing partner engage with each affected concession holder and draft a Memorandum of Understanding (MoU) which clearly outlines the roles and responsibilities of both parties in terms of financial obligations, protection of subsea infrastructure, insurance, rights and obligations and principles of co-operation. Should these MoUs be drawn up between the landing partner and concession holders, impacts on the O&G industry are considered negligible given the size of the concession blocks and the limited footprint of the marine telecommunications cable.</p> <p>Noted.</p> <p>Mr Groenewald has been added to the project database.</p>

Name and Organisation	Comment	Response
<p>Date: 19.02.2020 (Email) Ms Phumla Ngesi Petroleum Agency SA Environmental Compliance</p>	<p>Mr Eduard Groenewald, HSE Manager, Total E&P South Africa B.V., 27 Willie van Schoor Drive, Tygervally Chambers 2, 3rd Floor Tygervally, Belville, Cape Town, 079 995 1915, Eduard.groenewald@total.com</p> <p>Herewith attached, please receive:</p> <ul style="list-style-type: none"> • Comments on the proposed marine telecommunication systems. • A map showing the exploration blocks traversed by the proposed route. <p>Contact details of Exploration Rights holders that should be notified and consulted are as follows:</p> <p>Sezigyn (Pty) Ltd - Mr Thabang Kgomo / sungusunqu@mweb.co.za</p> <p>Impact Africa Limited - Ms Keely J Harris / k.harris@impactoilandgas.com</p> <p>Anadarko - Mr Marek Ranoszek / Marek.ranoszek@anadarko.com</p> <p>Africa Energy Corp - Mr Jan Maier / Jan.maier@africaenergycorp.com</p> <p>Should you need further information, please feel free to contact us.</p> <p>Comments Received</p> <p>The proposed route for the marine telecommunications system traverses' areas/blocks with active exploration rights. Please advise what potential impacts are envisaged from the proposed marine telecommunications system on exploration activities. If the potential impacts have not been identified or assessed, you are requested to do so. Please also note that the exploration right holders are your important stakeholders, and they should be consulted, if not yet identified.</p>	<p>Thank you for your email and comments. We have updated the projects database with the new contact details.</p> <p>The proposed alignment for the Equiano Cable System will follow the existing SAT-2 alignment and, as such, this cable corridor and associated buffer have been in place since 1993. The Equiano cable will not result in any further exclusions (through legislated buffers) to the O&G Industry for this development. To mitigate impacts on the O&G industry, it is recommended that the cable landing partner engage with each affected concession holder and draft a Memorandum of Understanding (MoU) which clearly outlines the roles and responsibilities of both parties in terms of financial obligations, protection of subsea infrastructure, insurance, rights and obligations and principles of co-operation. Should these MoUs be drawn up between the landing partner and concession holders, impacts on the O&G industry are considered negligible given the size of the concession blocks and the limited footprint of the marine telecommunications cable.</p>

Name and Organisation	Comment	Response
<p>Date: 03.03.2020 (Email) Mr Sabelo Malaza Department Environment, Forestry and Fisheries</p>	<p>COMMENTS ON THE DRAFT SCOPING REPORT (DSR) FOR THE PROPOSED MARINE TELECOMMUNICATION SYSTEM (EQUIANO CABLE SYSTEM) TO BE LANDED AT MELKBOSSTRAND ON THE WEST COAST, WESTERN CAPE PROVINCE</p> <p>The application form and draft Scoping Report (DSR) dated February 2020 and received by the Department on 05 February 2020 refer.</p> <p><u>This letter serves to inform you that the following information must be included in the final SR:</u></p> <p>Please ensure that all relevant listed activities are applied for, are specific and that it can be linked to the development activity or infrastructure as described in the project description.</p> <p>If the activities applied for in the application form differ from those mentioned in the final SR, an amended application form must be submitted. Please note that the Department's application form template has been amended and can be downloaded from the following link https://www.environment.gov.za/documents/forms . Please pay particular attention to point 17 on page 2 of the application form, which details the requirement to include the Department's compulsory Screening Tool Report.</p> <p>Please ensure that the application form is signed by the applicant and that the landowner consent form has been signed.</p> <p>It is imperative that the relevant authorities are continuously involved throughout the EIA process, as the development property possibly falls within geographically designated areas in terms of numerous GN R. 985 Activities. Written comments must be obtained from the relevant authorities and submitted to this Department. In addition, a graphical representation of the proposed development within the respective geographical areas must be provided.</p>	<p>Noted.</p> <p>Noted, this has been submitted with the Application for Authorisation.</p> <p>The Application has been signed by the applicant. There is no landowner consent form on the DEFF website, however, emails from landowners confirming their knowledge of the development were submitted with the Application for Authorisation and are included in Appendix 3 of the Final Scoping Report.</p> <p>All relevant authorities have been engaged from the onset of the EIA process and reminders for comment were sent to all authorities during the review period of the Draft Scoping Report (refer to Appendix 2 of the Final Scoping Report).</p>

Name and Organisation	Comment	Response
	<p>The final SR must provide evidence that all identified and relevant competent authorities have been given an opportunity to comment on the proposed development.</p> <p>The Public Participation Report must contain clear and legible copies of the newspaper adverts.</p> <p>Please ensure that all issues raised, and comments received during the circulation of the draft SR from registered I&APs and organs of state which have jurisdiction (including this Department's Biodiversity and Conservation Section) in respect of the proposed development are adequately addressed in the final SR. Proof of correspondence with the various stakeholders must be included in the final SR. Should you be unable to obtain comments, proof should be submitted to the Department of the attempts that were made to obtain comments. The Public Participation Process must be conducted in terms of Regulation 39,40,41,42, 43 and 44 of the EIA Regulations 2014.</p> <p>A comments and response report (C&R) must be submitted with the final SR. The C&R report must incorporate all comments for this development.</p> <p>Please provide a description of any identified alternatives for the proposed activity that are feasible and reasonable, including the advantages and disadvantages that the proposed activity or alternatives will have on the environment and on the community that may be affected by the activity as per Appendix 2 of the EIA Regulations, 2014. Alternatively, you should submit written proof of an investigation and motivation if no reasonable or feasible alternatives exist in terms of Appendix 2.</p> <p>Should the appointed specialists specify contradicting recommendations, the EAP must clearly indicate the most reasonable recommendation and substantiate this with defensible reasons; and where necessary, include further expertise advice.</p>	<p>Noted, this has been undertaken. Please refer to Appendix 2 of the Final Scoping Report for proof.</p> <p>Noted, this has been undertaken. Please refer to Appendix 2 of the Final Scoping Report for proof.</p> <p>All comments and issues raised by I&APs have been addressed and included in the Final Scoping Report. Reminders for comment were also sent to all authorities during the review period to request comment from the various authorities. Proof of this is included in Appendix 2 of the Final Scoping Report.</p> <p>Noted, this has been undertaken by the EAP and is included in Appendix 3 of the Final Scoping Report.</p> <p>As described in Chapter 6 of the Final Scoping Report, no feasible alternatives were identified other than the preferred alternative given that the proposed Equiano Cable System will make use of the now decommissioned SAT-2 offshore alignment (thereby limiting impacts on the marine environment, offshore concession holders and the fishing industry). Similarly, the Equiano cable will feed into the existing SAT-2 BMH, onshore cable sleeves and the CLS, thus, resulting in no disturbance to the terrestrial environment. The alternatives considered for this development are outlined in Chapter 6 of the Final Scoping Report.</p> <p>Noted; this will be done should the need arise.</p>

Name and Organisation	Comment	Response
	<p>Where specialist studies are conducted in-house or by a specialist other than a suitably qualified specialist in the relevant field, such specialist reports must be peer reviewed by a suitably qualified external specialist in the relevant field.</p> <p>In accordance with Appendix 2 of the EIA Regulations 2014, the details of-</p> <ul style="list-style-type: none"> > the EAP who prepared the report; and > the expertise of the EAP to carry out Scoping and Environmental Impact assessment procedures. <p>must be submitted.</p> <p>You are further reminded that the final SR to be submitted to this Department must comply with all the requirements in terms of the scope of assessment and content of Scoping Reports in accordance with Appendix 2 and Regulation 21 of the EIA Regulations, 2014.</p> <p>Further note that in terms of Regulation 45 of the EIA Regulations 2014, this application will lapse if the applicant fails to meet any of the timeframes prescribed in terms of these Regulations, unless an extension has been granted in terms of Regulation 3(7).</p> <p>You are hereby reminded of Section 24F of the National Environmental Management Act, Act No 107 of 1998, as amended, that no activity may commence prior to an environmental authorisation being granted by the Department.</p>	<p>Noted. No in-house specialists will be used for this assessment.</p> <p>Noted. Refer to Appendix 5 of the Final Scoping Report.</p> <p>Noted, this has been outlined in the table provided on pages xviii – xxi of the Final Scoping Report.</p> <p>Noted.</p> <p>Noted.</p>
<p>Date: 16.03.2020 (Email) Mr Gerhard Gerber Department of Environmental Affairs & Development Planning</p>	<p>COMMENT ON THE DRAFT SCOPING REPORT AND PLAN OF STUDY FOR ENVIRONMENTAL IMPACT ASSESSMENT FOR THE PROPOSED MARINE TELECOMMUNICATIONS SYSTEM (EQUIANO CABLE SYSTEM) TO BE LANDED AT MELKBOSSTRAND</p> <p>The Draft Scoping Report (“DSR”) dated February 2020 as received by the Department on 10 February 2020, and the e-mail notification of 12 February 2020 notifying interested and affected parties of the availability of the DSR, refer.</p>	<p>Thank you for your email and comments.</p>

Name and Organisation	Comment	Response
	<p>Thank you for your proactive engagement with the Department on the application via a pre-application meeting and the distribution of a Background Information Document. Please find consolidated comment from various directorates within the Department on the DSR and Plan of Study for Environmental Impact Assessment (“EIA”).</p> <p><u>Directorate: Development Management (Region 1)</u> Ms Rondine Isaacs (Rondine.Isaacs@westerncape.gov.za; Tel: (021) 483 4098):</p> <p>This Directorate has no comments on the DSR and Plan of Study for EIA. The Directorate awaits the Draft EIA Report for further comment.</p> <p><u>Directorate: Waste Management</u> Mr Muneeb Baderoon (Muneeb.Baderoon@westerncape.gov.za; Tel: (021) 483 2965):</p> <p>This Directorate has reviewed the DSR and awaits the Draft EIA Report for comment.</p> <p><u>Directorate: Pollution and Chemicals Management</u> Mr Gunther Frantz (Gunther.Frantz@westerncape.gov.za; Tel: (021) 483 2975):</p> <p>This Directorate has no comments on the DSR and awaits the Draft EIA Report with specialist studies to provide further comment.</p> <p>Please direct any enquiries to the official/s indicated in this correspondence should you require any clarity on any of the comments provided.</p> <p>The Department reserves the right to revise initial comments and request further information based on any information received.</p>	<p>Noted.</p> <p>Noted.</p> <p>Noted.</p> <p>Noted.</p> <p>Noted.</p>
<p>Date: 16.03.2020 (Email) Ms Pat Titmuss City of Cape Town Head: Environmental Management Department</p>	<p>PROPOSED MARINE TELECOMMUNICATIONS SYSTEM (EQUIANO CABLE SYSTEM) TO BE LANDED AT MELKBOSSTRAND, SOUTH AFRICA – DRAFT SCOPING REPORT</p> <p>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, refer.</p>	

Name and Organisation	Comment	Response
	<p>1. The comment raised by the City of Cape Town, dated 22 October 2019, has adequately been reflected in Appendix 3: <i>Comments & Responses Report</i> of the DSR.</p> <p>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.</p> <p>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: " <i>The need for an Oil Spill Contingency Plan will be included in the Proposed Plan of Study and draft CEMPr</i>".</p> <p>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.</p> <p>2. The proposed <i>Plan of Study</i> for the EIA stage, including the proposed specialists' Terms of References (ToR), listed in Section 9 of the report is considered sufficient.</p> <p>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.</p> <p>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.</p>	<p>Noted with thanks.</p> <p>The term "noted" as used in the comments and response report indicates that the issue raised has been noted and that the EAP will address the concerns/requirements in the EIA process. All requirements stipulated by the City of Cape Town will be addressed by the EAP.</p> <p>As with our response above, this requirement was "noted". The EAP will include an Oil Contingency Plan once the EIA has progressed to the stage that the EMPr is drafted for submission to the authorities and public for review.</p> <p>As requested, please see the first table (project announcement comments and responses) where responses to the City of Cape Town have been elaborated.</p> <p>Noted.</p> <p>Please note the ToR statement to "Address specific issues and concerns raised by I&APs" is included so that specialists can assist the EAP respond to issues raised by authorities and I&APs, some of which may be technical requiring specialist input. This does not negate from their other deliverable, which is to produce a specialist study assessment addressing each item listed in their terms of reference.</p> <p>These have been corrected.</p>

Name and Organisation	Comment	Response
	<p>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".</p> <p>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.</p> <p>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... "</p> <p>d. Page 95, key point 2, bullet point 1, referencing to " exotic and invader should be (invasive) species".</p> <p>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.</p> <p>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).</p> <p>The said draft EIR must be submitted to this office in the form of 1 hard copy and 1 electronic CD/flash disk version.</p>	<p>Thank you for your comments to date.</p> <p>Noted.</p>