

Our Ref:



an agency of the  
Department of Arts and Culture

T: +27 21 462 4502 | F: +27 21 462 4509 | E: [info@sahra.org.za](mailto:info@sahra.org.za)  
South African Heritage Resources Agency | 111 Harrington Street | Cape Town  
P.O. Box 4637 | Cape Town | 8001  
[www.sahra.org.za](http://www.sahra.org.za)

Enquiries: Ruan Brand  
Tel: 0214628672  
Email: [RBrand@sahra.org.za](mailto:RBrand@sahra.org.za)

Date: Monday November 07, 2022

Page No: 1

CaseID: 19936

## Interim Comment

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

Attention: SRK Consulting (Pty) Ltd - Western Cape

The Administrative Building, 183 Main Road, Albion Springs  
7700 Rondebosch, South Africa  
PostNet Suite #206, Private Bag X18  
7701 Rondebosch

**At Mossel Bay, PetroSA needs to institute repairs and modifications to the existing Single Point Mooring System (SPM) infrastructure. Portions of the pipelines have become corroded and PetroSA proposes to install two new ~1.4 km long bypass steel pipelines (12" and 14"), connected to the existing SPM infrastructure, to bypass the corroded section.**

The South African Heritage Resources Agency (SAHRA) would like to thank you for submitting the Underwater Heritage Impact Assessment (UHIA) as part of the Basic Assessment (BA) process, in line with section 38(8) of the National Heritage Resources Act (No. 25 of 1999) (NHRA), for the proposed repairs/modifications to the existing PetroSA Pipeline in Mossel Bay, Western Cape.

Please note that the SAHRA, through its Maritime and Underwater Cultural Heritage (MUCH) unit, is the commenting authority for heritage for works that trigger the Basic Assessment/Environmental Impact Assessment process below the high-water mark in line with sections 2, 35, and 38 of the NHRA. For impacts to heritage above the high-water mark comment needs to be obtained from the Provincial Heritage Resources Agency (PHRA). As the SAHRA is yet to see the Draft Basic Assessment Report (DBAR), at this stage, the SAHRA cannot advise on whether heritage resources outside SAHRA's remit may be impacted by, for example, transporting assembled pipelines from the tank farm to the ocean, or therefore, whether comment must be sought from the relevant PHRA.

The DBAR will be submitted at a later stage and evaluated before the SAHRA can approve or refuse to support the project. However, the UHIA provides a summary of the proposed works, its potential impacts to underwater tangible heritage resources, as well as mitigation measures. The works entail installing two new 1.4km long bypass steel pipelines, 15 m adjacent and parallel to the existing Single Point Mooring System pipeline. The pipelines will be fabricated and assembled just behind the beach at the PetroSA Tank Farm and then towed into the ocean using buoyancy tanks and ballast weights. They will then be parked and installed

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once the weather window allows for installation. The new pipelines will be installed via jetting below the seabed, and the disturbed seabed area will be allowed to backfill naturally.

Although there are no confirmed heritage resources, and specifically no known archaeological wrecks near the pipeline, the jetting phase of the project will disturb the seabed and might uncover or damage unknown buried heritage resources. The UHIA identified 12 possible archaeological shipwrecks in the area, of which seven are of either highly probable or probable likelihood to be within or near the area of the works. As the existing pipeline would make too much magnetic noise, a magnetometer survey is not proposed to attempt to identify MUCH resources. However, a hydrographic survey is already being undertaken and this might identify some MUCH resources. Furthermore, the UHIA proposes an archaeological induction to allow the on-site workers to be able to identify and understand the significance of MUCH resources.

The SAHRA supports the mitigation measures proposed on page 44-48 of the UHIA, with the specific recommendations on page 48 suggesting which conditions must be met for the proposed works to be supported. The following additional measures must be included to ensure that accidental heritage resource encounters are also covered:

- If any heritage material, be it archaeological or palaeontological, is accidentally encountered, work must cease in the directly affected area immediately to avoid damage to the heritage resource(s). The SAHRA must be notified as soon as possible and only once the contractor(s) has complied with any additional mitigation measures, as specified by the SAHRA, can the work continue, and;
- Where possible, if any heritage material is accidentally recovered, photographs must be taken, noting the date, time, location, as well as type of artefacts, and this information must be shared with the SAHRA. Please note that under no circumstances may any artefacts be removed, destroyed, or interfered with, without an appropriate permit from the SAHRA.

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SAHRA reiterates, that according to section 35(3) of the NHRA, if any heritage resource is discovered this must be reported to SAHRA immediately. Heritage resources that might be applicable in this case, include, but are not limited to; archaeological fossils, palaeontological fossils, and pieces of shipwreck material older than 60 years.

Please note that all updates and/or changes to the project, supporting documentation, correspondence, reports, or any other work relating to the project must be uploaded to the case on SAHRIS to provide SAHRA with the opportunity to comment. SAHRA does not accept emailed documents or hard-copy documents received via post.

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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Ruan Brand  
Heritage Officer  
South African Heritage Resources Agency

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

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# Repairs/Modifications to Existing PetroSA Pipeline (Mossel Bay)

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Enquiries: Ruan Brand  
Tel: 0214628672  
Email: [RBrand@sahra.org.za](mailto:RBrand@sahra.org.za)  
CaseID: 19936

Date: Monday November 07, 2022  
Page No: 4

## ADMIN:

Direct URL to case: <https://sahris.sahra.org.za/node/607422>

## 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.

## Lauren Elston

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**From:** Waseefa Dhansay <Waseefa.Dhansay@westerncape.gov.za>  
**Sent:** Monday, 14 November 2022 15:44  
**To:** Lauren Elston  
**Cc:** Ruan Brand; vanessa@cocojams.co.za; Dian Naicker; Mfanimpela Shabangu  
**Subject:** RE: Mossel Bay Bypass Pipeline Commenting Authority

### EXTERNAL

Dear Lauren

HWC will not require a Section 38 process to follow – you may proceed with engaging further with SAHRA.

***Please take note of the following notice for the submissions of consideration of applications in 2022***  
**[Heritage Western Cape 2022 December Operational Time Frames](#)**

Kind regards

**Waseefa Dhansay**  
**Assistant Director: Professional Services**

Heritage Resource Management Services  
Protea Assurance Building Greenmarket Square, Cape Town

Website: [www.hwc.org.za](http://www.hwc.org.za) / [www.westerncape.gov.za](http://www.westerncape.gov.za)



---

**From:** Lauren Elston <LElston@srk.co.za>  
**Sent:** Friday, November 11, 2022 11:59 AM  
**To:** Waseefa Dhansay <Waseefa.Dhansay@westerncape.gov.za>  
**Cc:** Ruan Brand <rbrand@sahra.org.za>; vanessa@cocojams.co.za; Dian Naicker <DIAN.Naicker@petrosa.co.za>; Mfanimpela Shabangu <MFANIMPELA.Shabangu@petrosa.co.za>  
**Subject:** Mossel Bay Bypass Pipeline Commenting Authority

Dear Waseefa

In order to bypass a corroded section of existing 12” and 14” subsea pipelines, PetroSA proposes to **modify the existing subsea pipeline bundle by installing two new ~1.4 km steel pipelines (12” and 14”) (referred to as a dual pipeline) on the seabed**, parallel to and ~15 m from the existing housing structure (see Appendix A2).

The new pipelines will be welded together in strings of approximately 200 m at the fabrication (pipeline assembly) site at PetroSA’s Logistic Base (see Figure 1), and pulled (launched) to sea by a customised tugboat across an

elevated ~8.5 m wide launch-way on the beach (see Figure 1 and 2 below and attached KMZ for launch way corridor). The launch way will comprise elevated rollers spaced apart to support the dual pipeline.

We are aware that SAHRA, through its Maritime and Underwater Cultural Heritage (MUCH) unit, is the commenting authority for heritage for works that trigger the Basic Assessment process **below the high-water mark** in line with sections 2, 35, and 38 of the NHRA. – SAHRA has provided Interim comment following upload of application onto SAHRIS– attached.

The launch-way is only a temporary structure required to launch the pipes into the sea. **The length of the linear structure above the high water mark is approximately 100m.** A Maritime Heritage Impact Assessment has been conducted to inform the BAR.

Can you please advise if comment or approval is also required by Heritage Western Cape? We did not scope for two separate heritage application processes with both heritage authorities we has assumed heritage approval / final comment was only in this case required by SAHRA.

Please advise?

Thank you in advance.

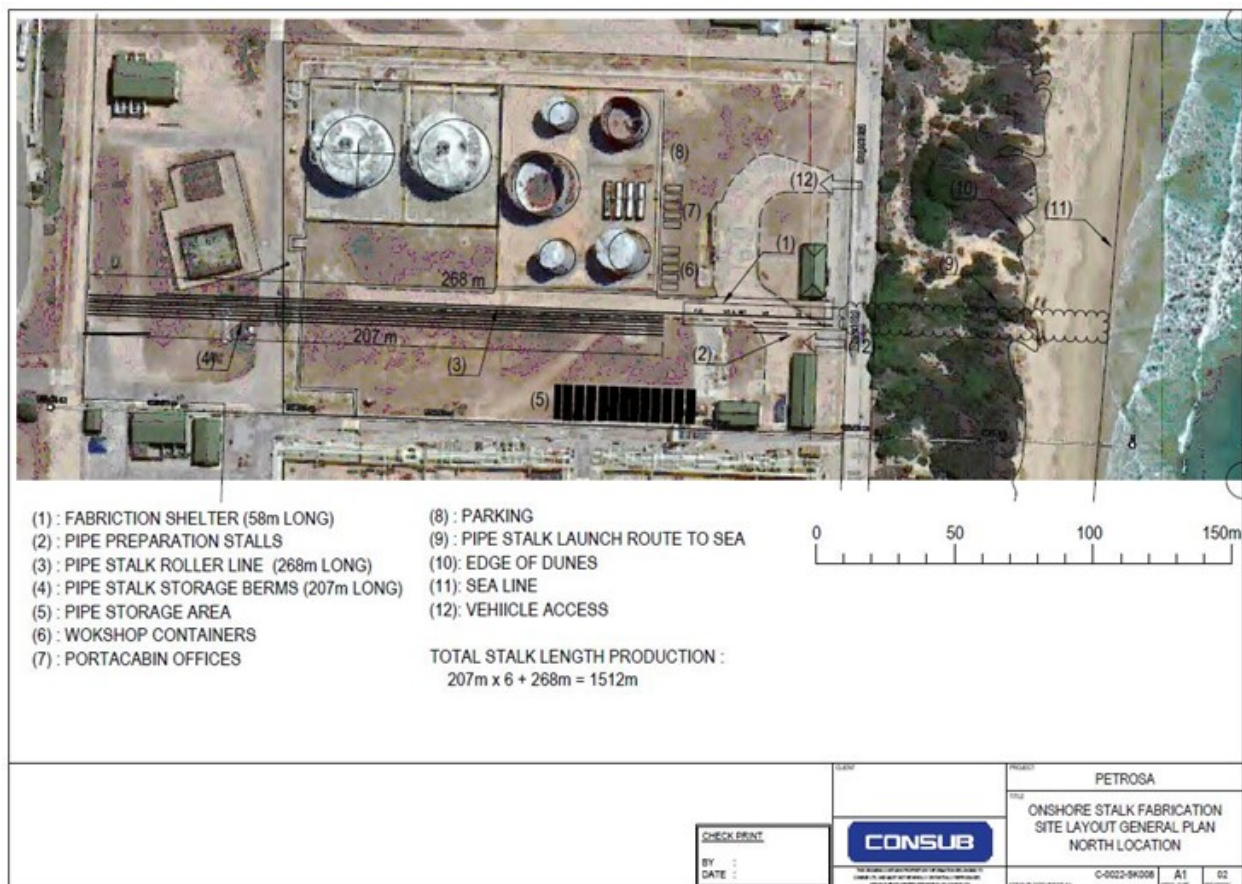
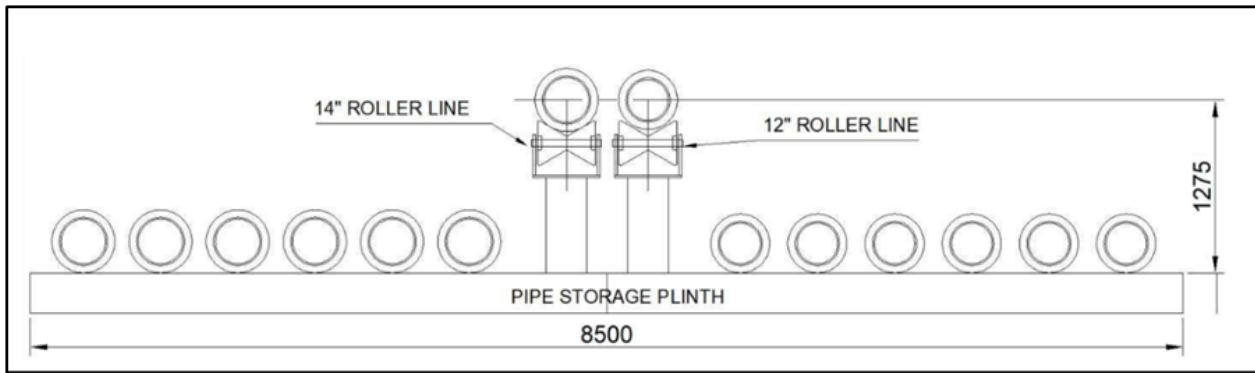


Figure 1: Fabrication site, showing position of the elevated launch-way (no. 9)



**Figure 2: Pipe stalk roller line layout proposal**

Kind Regards,

**Lauren Elston** Registered EAP, BSc (EnvSc), BSc (Hons) (Env Mngt), IAIAAsa  
Senior Environmental Consultant



SRK Consulting (South Africa) (Pty) Ltd.

The Administrative Building, Albion Spring, 183 Main Road, Rondebosch, 7700, South Africa  
Postnet Suite #206, Private Bag X18, Rondebosch, 7701, South Africa

**Tel:** +27-(0)21-659-3060; **Fax:** +27-(0)21-685-7105

**Mobile:** +27-(0)71-992-2341; **Direct:** +27-(0)21-659-3063

**Email:** [lelston@srk.co.za](mailto:lelston@srk.co.za);

[www.srk.co.za](http://www.srk.co.za)

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## Lauren Elston

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**From:** Kruger, Eddie <ekruger@mosselbay.gov.za>  
**Sent:** Wednesday, 23 November 2022 12:18  
**To:** Lauren Elston  
**Cc:** Abrahams, Mushfiqah; Mfanimpela Shabangu; Dian Naicker  
**Subject:** RE: Basic Assessment EIA Process: Proposed Bypass Pipelines and Repositioning of Single-Point Mooring (SPM) Buoy, Mossel Bay

### EXTERNAL

Lauren

According to our GIS and records erf 1358 does belong to the Municipality.

Regards



### Eddie Kruger

#### Manager (Town Planning)

101 Marsh Street, Mossel Bay  
Email: [ekruger@mosselbay.gov.za](mailto:ekruger@mosselbay.gov.za)  
Web: <https://www.mosselbay.gov.za>  
Tel: +27 44 606-5070



MOSSSEL BAY | HARTENBOS | GREAT BRAK RIVER | HERBERTSDALE

Anti-Fraud Hotline: 0800 333 466

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**From:** Lauren Elston <LElston@srk.co.za>  
**Sent:** Wednesday, 23 November 2022 11:53 AM  
**To:** Kruger, Eddie <ekruger@mosselbay.gov.za>  
**Cc:** Abrahams, Mushfiqah <mushfiqah.abrahams@mosselbay.gov.za>; Mfanimpela Shabangu <MFANIMPELA.Shabangu@petrosa.co.za>; Dian Naicker <DIAN.Naicker@petrosa.co.za>  
**Subject:** RE: Basic Assessment EIA Process: Proposed Bypass Pipelines and Repositioning of Single-Point Mooring (SPM) Buoy, Mossel Bay

Dear Mr Kruger or Ms Abrahams

Please can you advise on the query below? Does the Municipality own Erf 1358?

Kind Regards,  
Lauren

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**From:** Lauren Elston  
**Sent:** Wednesday, 16 November 2022 15:30  
**To:** [ekruger@mosselbay.gov.za](mailto:ekruger@mosselbay.gov.za)  
**Cc:** Abrahams, Mushfiqah <[mushfiqah.abrahams@mosselbay.gov.za](mailto:mushfiqah.abrahams@mosselbay.gov.za)>  
**Subject:** FW: Basic Assessment EIA Process: Proposed Bypass Pipelines and Repositioning of Single-Point Mooring (SPM) Buoy, Mossel Bay

Dear Mossel Bay Municipality Town Planning Department



PetroSA proposes to modify their existing Single Point Mooring (SPM) system. It is proposed to construct two **subsea** 1.4 km parallel bypass pipelines connected to the existing pipelines, new Pipeline End Manifold (PLEM) seabed structure and repositioning of an existing Single-Point Mooring (SPM) buoy to tie into the new PLEM, offshore of Voorbaai, Mossel Bay. – see attached site locality and layout plans.

The new pipelines will be welded at the existing PetroSA facility and launched to sea over **a temporary launch-way to be constructed over Erf 1358 and on the beach (between the HWM and LWM)**, to launch the pipelines to sea.

SRK Consulting (South Africa) (Pty) Ltd (SRK) has been appointed to undertake the environmental process required in terms of the National Environmental Management Act 107 of 1998, as amended (NEMA) in support of the application for Environmental Authorisation (EA); in this case, a Basic Assessment (BA) process for this project.

I am looking for the “landowner” for Erf 1358 – a registered Erf (public place). – see image below. Please can you assist in this regard?



Kind Regards,

Lauren Elston Registered EAP, BSc (EnvSc), BSc (Hons) (Env Mngt), IAIA

Senior Environmental Consultant



SRK Consulting (South Africa) (Pty) Ltd.

The Administrative Building, Albion Spring, 183 Main Road, Rondebosch, 7700, South Africa  
Postnet Suite #206, Private Bag X18, Rondebosch, 7701, South Africa

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**Mobile:** +27-(0)71-992-2341; **Direct:** +27-(0)21-659-3063

**Email:** [lelston@srk.co.za](mailto:lelston@srk.co.za);

[www.srk.co.za](http://www.srk.co.za)

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Mossel Bay Municipality,  
101 Marsh Street,  
Mossel Bay,  
6506,  
South Africa

Tel: +27 44 606 5000

[www.mosselbay.gov.za](http://www.mosselbay.gov.za)

---

## Lauren Elston

---

**From:** Bathandwa Ncube <BNcube@dffe.gov.za>  
**Sent:** Wednesday, 22 February 2023 12:59  
**To:** Lauren Elston  
**Cc:** Dian Naicker; Mfanimpela Shabangu; Christopher Dalgliesh  
**Subject:** RE: Proposed Offshore Bypass Pipelines and Associated Infrastructure, PetroSA, Mossel Bay: Submission of EA Application Form and DBAR Release

### EXTERNAL

Goodday Lauren

Your email is noted. It is assumed that the points discussed in the previous emails have been finalised.

Kind regards

**Ms Bathandwa Ncube**

Department of Forestry, Fisheries and the Environment (DFFE)

Integrated Environmental Authorisations

EAPASA Registration: 2021/3238

(T) 012 399 9368

(E) [BNcube@dffe.gov.za](mailto:BNcube@dffe.gov.za)

---

**From:** Lauren Elston <LElston@srk.co.za>  
**Sent:** Wednesday, 22 February 2023 12:50  
**To:** Bathandwa Ncube <BNcube@dffe.gov.za>  
**Cc:** Dian Naicker <DIAN.Naicker@petrosa.co.za>; Mfanimpela Shabangu <MFANIMPELA.Shabangu@petrosa.co.za>; Christopher Dalgliesh <CDalgliesh@srk.co.za>  
**Subject:** RE: Proposed Offshore Bypass Pipelines and Associated Infrastructure, PetroSA, Mossel Bay: Submission of EA Application Form and DBAR Release

Dear Ms. Ncube

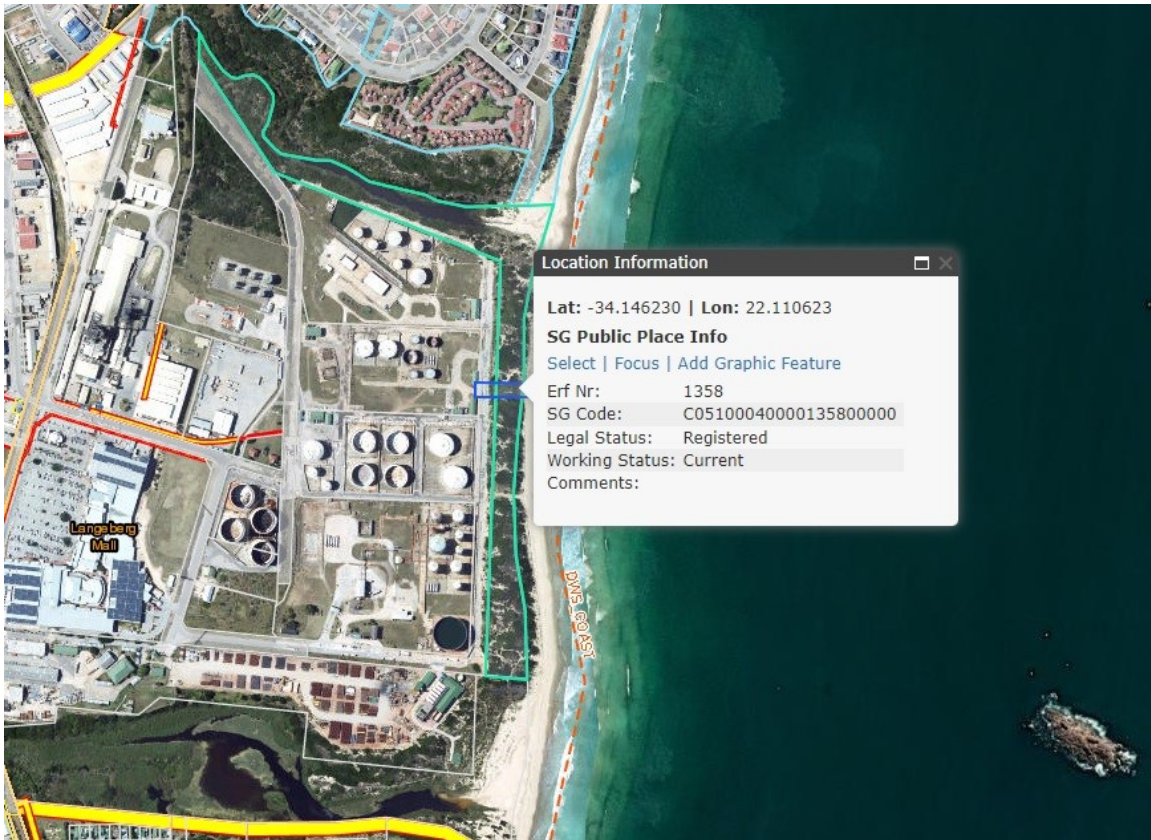
### **RE: Proposed Offshore Bypass Pipelines and Associated Infrastructure, PetroSA, Mossel Bay**

I tried calling you but unfortunately the landline goes to voicemail.

PetroSA proposes to modify their existing Single Point Mooring (SPM) system. It is proposed to construct two **subsea** 1.4 km parallel bypass pipelines connected to the existing pipelines, new Pipeline End Manifold (PLEM) seabed structure and repositioning of an existing Single-Point Mooring (SPM) buoy to tie into the new PLEM, offshore of Voorbaai, Mossel Bay.

The new pipelines will be welded at the existing PetroSA facility and launched to sea over a temporary launch-way to be constructed over Erf 1358 and on the beach (between the HWM and LWM), to launch the pipelines to sea. – see image of proposed launch way below.

The Department of Forestry, Fisheries and Environment (DFFE) have confirmed in writing that landowner approval is not required for the offshore activities. We are however still waiting on landowner approval from the Mossel Bay Municipality (owners of Erf 1358) for the construction of the temporary launch way on erf 1358. It is our intention to proceed with the submission of the Environmental Authorisation (EA) Application Form and the Draft Basic Assessment Report via the online DFFE system either tomorrow or on Friday, and to forward the content from the Municipality as soon as we receive it.



We trust this will be in order.

Kind Regards,

**Lauren Elston** Registered EAP, BSc (EnvSc), BSc (Hons) (Env Mngt), IAIAAsa  
Senior Environmental Consultant



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Email: [lelston@srk.co.za](mailto:lelston@srk.co.za);

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---

**From:** Bathandwa Ncube <[BNcube@dffe.gov.za](mailto:BNcube@dffe.gov.za)>

**Sent:** Monday, 05 September 2022 14:59

**To:** Bianca Hagen <[BHagen@srk.co.za](mailto:BHagen@srk.co.za)>; Lauren Elston <[LElston@srk.co.za](mailto:LElston@srk.co.za)>

**Cc:** Dian Naicker <[DIAN.Naicker@petrosa.co.za](mailto:DIAN.Naicker@petrosa.co.za)>; Mfanimpela Shabangu <[MFANIMPELA.Shabangu@petrosa.co.za](mailto:MFANIMPELA.Shabangu@petrosa.co.za)>; Ashleen Julius <[ASHLEEN.Julius@petrosa.co.za](mailto:ASHLEEN.Julius@petrosa.co.za)>; Christopher Dalglish <[CDalglish@srk.co.za](mailto:CDalglish@srk.co.za)>; Masina Morudu <[memorudu@dffe.gov.za](mailto:memorudu@dffe.gov.za)>

**Subject:** PetroSA DFFE Pre-application meeting: Proposed Bypass Pipelines and Repositioning of Single-Point Mooring (SPM) Buoy, Mossel Bay

**EXTERNAL**

Goodday Bianca and Lauren

Apologies for the late response to your query. There was an agreement that we would discuss your matter at our bi-weekly Chief Directorate Monday meeting, unfortunately, those meetings have been postponed twice, therefore we have not had one since the day of the pre-app meeting, however, we have enquired with fellow colleagues.

1. The Minutes of the meeting and the Final Site Sensitivity Report have been reviewed. Regarding Section 3.1 of the sensitivity report;
  - Aquatic Biodiversity; Agricultural and Animal Species Assessments: As per section 2.3 of the Biodiversity and Terrestrial Animal Species protocols, please provide evidence of the "insignificant" sensitivity verification, as per the motivation provided.
  - Terrestrial Biodiversity and Plant Species Impact Assessments: Compliance statements are acceptable as per the requirements of the protocols.
  - Archaeological and Cultural Heritage and Paleontology Impact Assessments: The NID and Heritage Statement must be submitted to the Heritage Western Cape (HWC). Submission to SAHRA for proposed developments in the Western Cape province is optional.
  - Civil Aviation Assessment: As per section 2.3 of the Civil Aviation protocol, please provide evidence of the "insignificant" sensitivity verification, in the form of comments from the relevant authorities.
  - Defence Assessment: No assessment is required. Comments may be requested from the Department of Defence.
  - Geotechnical Assessment: Please confirm whether the studies that have been undertaken will be included in the reports that will accompany this application.
  - Socio-Economic Assessment: The proposed assessment of socio-economic impacts is accepted.
  - Landscape/Visual and Avifaunal Impact Assessment: The screening tool report is not attached to the pre-application documents; therefore, it is assumed that there were no sensitivity ratings assigned for these 2 themes. If this is true, the motivation is accepted.
  - Marine Impact Assessment: It is not clear when the Marine Ecology Assessment was conducted, however the Desktop Marine Ecology Statement.

Should any baseline studies which will be conducted, result in the need for further assessment, the applicant will be expected to carry out further assessments.

2. Maintenance activities for the existing pipeline may not be included in the EMPr for the proposed expansion application. Should the proposed expansion be granted authorisation, the EA holder is advised to apply for the adoption of one MMP for both the existing and expanded pipelines (afterwards). Otherwise, the proponent may apply for the adoption of the MMP for the existing pipeline, separately from the EMPr of the proposed expansion pipeline.
- 3.
4. and 4. The applicant (as assisted by the EAP) is required to adhere to the minimum public participation requirements, as stated in the EIA Regulations 2014 (as amended). The Department cannot stipulate which newspaper to advertise in, or if the neighbouring residential area can be defined as adjacent or not. The EAP is entrusted with the expertise to conduct public participation that ensures that no Interested and (most importantly) affected party is disadvantaged in terms of being provided a fair opportunity to comment on the proposed project.
5. The applicant is advised to contact the Mossel Bay Local Municipality regarding landowner consent.

Kind regards  
Bathandwa Ncube

---

**From:** Bianca Hagen <[BHagen@srk.co.za](mailto:BHagen@srk.co.za)>  
**Sent:** Friday, August 19, 2022 3:35 PM  
**To:** Bathandwa Ncube <[BNcube@dffe.gov.za](mailto:BNcube@dffe.gov.za)>  
**Cc:** Dian Naicker <[DIAN.Naicker@petrosa.co.za](mailto:DIAN.Naicker@petrosa.co.za)>; Mfanimpela Shabangu <[MFANIMPELA.Shabangu@petrosa.co.za](mailto:MFANIMPELA.Shabangu@petrosa.co.za)>; Ashleen Julius <[ASHLEEN.Julius@petrosa.co.za](mailto:ASHLEEN.Julius@petrosa.co.za)>; Lauren Elston <[LElston@srk.co.za](mailto:LElston@srk.co.za)>; Christopher Dalgliesh <[CDalgliesh@srk.co.za](mailto:CDalgliesh@srk.co.za)>; Masina Morudu <[memorudu@dffe.gov.za](mailto:memorudu@dffe.gov.za)>  
**Subject:** PetroSA DFFE Pre-application meeting: Proposed Bypass Pipelines and Repositioning of Single-Point Mooring (SPM) Buoy, Mossel Bay

Dear Bathandwa,

**RE: Proposed Bypass Pipelines and Repositioning of Single-Point Mooring (SPM) Buoy, Mossel Bay**

Please find attached Meeting Notes for the Pre-Application Meeting that took place for the above-mentioned project on 11 August 2022 along with the Final Site Sensitivity Report.

In summary, we please request confirmation in writing from the Department on the following:

1. If the specialist studies indicated in the Site Sensitivity Report proposed to be undertaken are sufficient;
2. Whether maintenance activities for the existing pipeline can be included in the Environmental Management Programme (EMPr) for the project;
3. If advertising in a local newspaper will suffice (no regional or national newspaper required);
4. If physical letter drops / postal notification to residents (in terms of the 2014 Environmental Impact Assessment (EIA) Regulations) is required (since there are no adjacent landowners); and
5. Who the contact person at the Department of Forestry, Fisheries and the Environment (DFFE) is to obtain landowner consent.

We would greatly appreciate it if you could provide a response to item 1 above (via email will suffice) in the meantime so we can appoint the necessary specialists to commence work without further delay.

King Regards,

Bianca

**Bianca Hagen** *Candidate EAP (EAPASA); BSc (Hons) (BDE); MPhil (EnvMngt)*



Environmental Consultant

SRK Consulting (South Africa) (Pty) Ltd.

The Administrative Building, Albion Spring, 183 Main Road, Rondebosch, 7700, Cape Town, South Africa  
Postnet Suite #206, Private Bag X18, Rondebosch, 7701, Cape Town, South Africa

**Tel:** +27 (0)21 659 3060; **Fax:** +27 (0)21 685 7105

**Mobile:** +27 (0)84 512 2100; **Direct:** +27 (0)21 659 3079

**Skype for Business:** [hagb@srk.co.za](mailto:hagb@srk.co.za)

**Email:** [bhagen@srk.co.za](mailto:bhagen@srk.co.za)

[www.srk.co.za](http://www.srk.co.za)

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## Lauren Elston

---

**From:** IQ <IQ@dffe.gov.za>  
**Sent:** Thursday, 20 October 2022 11:59  
**To:** Lauren Elston  
**Subject:** IQ/22/0302: Basic Assessment EIA Process: Proposed Bypass Pipelines and Repositioning of Single-Point Mooring (SPM) Buoy, Mossel Bay  
**Attachments:** Site Location and Site Layout Maps.pdf  
**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

### EXTERNAL

Dear Lauren

The IQ Helpdesk had engaged the Chief Directorate (CD): Law Reform and Policy Coordination, as well as the CD: Integrated Coastal Management and it has been concluded that regulation 39(1) does not apply to developments in the sea, or to coastal public property as defined in the National Environmental Management: Integrated Coastal Management Act, 2008 (Act No. 24 of 2008) ("the ICMA").

Therefore, landowner consent is not required for activities undertaken exclusively in coastal public property. However, if any part of a coastal public property- based activity takes place on land i.e. above the high water mark, then regulation 39(1) will apply. For example, where a cable or pipeline comes ashore onto land, where that cable or pipeline is laid crosses land above the high-water mark, then landowner consent i.t.o. regulation 39(1) will be a requirement for that part of the activity.

Kind regards  
Chantal Engelbrecht

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**From:** IQ <IQ@dffe.gov.za>  
**Sent:** Thursday, 20 October 2022 08:42  
**To:** Chantal Engelbrecht <CENGELBRECHT@dffe.gov.za>  
**Cc:** Betty Mdala <BMDALA@dffe.gov.za>  
**Subject:** FW: Basic Assessment EIA Process: Proposed Bypass Pipelines and Repositioning of Single-Point Mooring (SPM) Buoy, Mossel Bay IQ/22/0302

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**From:** Lauren Elston <LElston@srk.co.za>  
**Sent:** Wednesday, 19 October 2022 09:38  
**To:** IQ <IQ@dffe.gov.za>; IQ <IQ@dffe.gov.za>  
**Cc:** Nitasha Baijnath-Pillay <Nbpillay@dffe.gov.za>; Mulalo Tshikotshi <Mtshikot@dffe.gov.za>; OCEIA <OCEIA@dffe.gov.za>; Dian Naicker <DIAN.Naicker@petrosa.co.za>; Mfanimpela Shabangu <MFANIMPELA.Shabangu@petrosa.co.za>  
**Subject:** FW: Basic Assessment EIA Process: Proposed Bypass Pipelines and Repositioning of Single-Point Mooring (SPM) Buoy, Mossel Bay

Dear DFFE IQ Helpdesk

Please can you advise who the landowners is for a offshore project off the coast of Mossel Bay?

We need to engage with DFFE to obtain landowner consent for PetroSA to undertake modifications (repairs) to their existing pipeline.

Please can you kindly assist, I have been trying (unsuccessfully) on many occasions to obtain the relevant DFFE contact.

Kind Regards,

**Lauren Elston** Registered EAP, BSc (EnvSc), BSc (Hons) (Env Mngt), IAIAAsa  
Senior Environmental Consultant



SRK Consulting (South Africa) (Pty) Ltd.

The Administrative Building, Albion Spring, 183 Main Road, Rondebosch, 7700, South Africa  
Postnet Suite #206, Private Bag X18, Rondebosch, 7701, South Africa

**Tel:** +27-(0)21-659-3060; **Fax:** +27-(0)21-685-7105

**Mobile:** +27-(0)71-992-2341; **Direct:** +27-(0)21-659-3063

**Email:** [lelston@srk.co.za](mailto:lelston@srk.co.za);

[www.srk.co.za](http://www.srk.co.za)

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**From:** Lauren Elston

**Sent:** Friday, 30 September 2022 09:09

**To:** [nbpillay@environment.gov.za](mailto:nbpillay@environment.gov.za); [mtshikot@environment.gov.za](mailto:mtshikot@environment.gov.za); [OCeia@environment.gov.za](mailto:OCeia@environment.gov.za)

**Cc:** Bianca Hagen <[BHagen@srk.co.za](mailto:BHagen@srk.co.za)>

**Subject:** RE: Basic Assessment EIA Process: Proposed Bypass Pipelines and Repositioning of Single-Point Mooring (SPM) Buoy, Mossel Bay

Dear DFFE: Oceans and Coasts Department

Please can you assist with the query below?

Kind Regards,

**Lauren Elston** Registered EAP, BSc (EnvSc), BSc (Hons) (Env Mngt), IAIAAsa  
Senior Environmental Consultant



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The Administrative Building, Albion Spring, 183 Main Road, Rondebosch, 7700, South Africa  
Postnet Suite #206, Private Bag X18, Rondebosch, 7701, South Africa

**Tel:** +27-(0)21-659-3060; **Fax:** +27-(0)21-685-7105

**Mobile:** +27-(0)71-992-2341; **Direct:** +27-(0)21-659-3063

**Email:** [lelston@srk.co.za](mailto:lelston@srk.co.za);

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---

**From:** Lauren Elston  
**Sent:** Monday, 19 September 2022 13:33  
**To:** [nbpillay@environment.gov.za](mailto:nbpillay@environment.gov.za); [mtshikot@environment.gov.za](mailto:mtshikot@environment.gov.za); [OCeia@environment.gov.za](mailto:OCeia@environment.gov.za)  
**Cc:** Bianca Hagen <[BHagen@srk.co.za](mailto:BHagen@srk.co.za)>  
**Subject:** Basic Assessment EIA Process: Proposed Bypass Pipelines and Repositioning of Single-Point Mooring (SPM) Buoy, Mossel Bay

Dear DFFE: Oceans and Coasts Department

PetroSA proposes to modify their existing Single Point Mooring (SPM) system. It is proposed to construct two 1.4 km parallel bypass pipelines connected to the existing pipelines, new Pipeline End Manifold (PLEM) seabed structure and repositioning of an existing Single-Point Mooring (SPM) buoy to tie into the new PLEM, offshore of Voorbaai, Mossel Bay.

The new pipelines will be welded at the existing PetroSA facility and launched to sea over a temporary launch-way to be constructed on the beach, prior to the installation of the pipelines on the seabed.

SRK Consulting (South Africa) (Pty) Ltd (SRK) has been appointed to undertake the environmental process required in terms of the National Environmental Management Act 107 of 1998, as amended (NEMA) in support of the application for Environmental Authorisation (EA); in this case, a Basic Assessment (BA) process for this project.

Can you assist in providing us the **contact details for the relevant DFFE: Oceans and Coasts official(s) to provide comment on the Basic Assessment EIA process** and importantly, **who is the landowner for this sea-based project, offshore of Mossel Bay?** – we need to include landowner consent with the EA Application Form and require contact details for the landowner.

Your assistance in this regard would be greatly appreciated.

Kind Regards,

**Lauren Elston** *Registered EAP, BSc (EnvSc), BSc (Hons) (Env Mngt), IAIAAsa*  
Senior Environmental Consultant



SRK Consulting (South Africa) (Pty) Ltd.

The Administrative Building, Albion Spring, 183 Main Road, Rondebosch, 7700, South Africa  
Postnet Suite #206, Private Bag X18, Rondebosch, 7701, South Africa

**Tel:** +27-(0)21-659-3060; **Fax:** +27-(0)21-685-7105

**Mobile:** +27-(0)71-992-2341; **Direct:** +27-(0)21-659-3063

**Email:** [lelston@srk.co.za](mailto:lelston@srk.co.za);

[www.srk.co.za](http://www.srk.co.za)

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## Lauren Elston

---

**From:** Bathandwa Ncube <BNcube@dffe.gov.za>  
**Sent:** Monday, 05 September 2022 14:59  
**To:** Bianca Hagen; Lauren Elston  
**Cc:** Dian Naicker; Mfanimpela Shabangu; Ashleen Julius; Christopher Dalgliesh; Masina Morudu  
**Subject:** PetroSA DFFE Pre-application meeting: Proposed Bypass Pipelines and Repositioning of Single-Point Mooring (SPM) Buoy, Mossel Bay

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

### EXTERNAL

Goodday Bianca and Lauren

Apologies for the late response to your query. There was an agreement that we would discuss your matter at our bi-weekly Chief Directorate Monday meeting, unfortunately, those meetings have been postponed twice, therefore we have not had one since the day of the pre-app meeting, however, we have enquired with fellow colleagues.

1. The Minutes of the meeting and the Final Site Sensitivity Report have been reviewed. Regarding Section 3.1 of the sensitivity report;
  - Aquatic Biodiversity; Agricultural and Animal Species Assessments: As per section 2.3 of the Biodiversity and Terrestrial Animal Species protocols, please provide evidence of the "insignificant" sensitivity verification, as per the motivation provided.
  - Terrestrial Biodiversity and Plant Species Impact Assessments: Compliance statements are acceptable as per the requirements of the protocols.
  - Archaeological and Cultural Heritage and Paleontology Impact Assessments: The NID and Heritage Statement must be submitted to the Heritage Western Cape (HWC). Submission to SAHRA for proposed developments in the Western Cape province is optional.
  - Civil Aviation Assessment: As per section 2.3 of the Civil Aviation protocol, please provide evidence of the "insignificant" sensitivity verification, in the form of comments from the relevant authorities.
  - Defence Assessment: No assessment is required. Comments may be requested from the Department of Defence.
  - Geotechnical Assessment: Please confirm whether the studies that have been undertaken will be included in the reports that will accompany this application.
  - Socio-Economic Assessment: The proposed assessment of socio-economic impacts is accepted.
  - Landscape/Visual and Avifaunal Impact Assessment: The screening tool report is not attached to the pre-application documents; therefore, it is assumed that there were no sensitivity ratings assigned for these 2 themes. If this is true, the motivation is accepted.
  - Marine Impact Assessment: It is not clear when the Marine Ecology Assessment was conducted, however the Desktop Marine Ecology Statement.

Should any baseline studies which will be conducted, result in the need for further assessment, the applicant will be expected to carry out further assessments.

2. Maintenance activities for the existing pipeline may not be included in the EMPr for the proposed expansion application. Should the proposed expansion be granted authorisation, the EA holder is advised to apply for the adoption of one MMP for both the existing and expanded pipelines (afterwards). Otherwise, the proponent may apply for the adoption of the MMP for the existing pipeline, separately from the EMPr of the proposed expansion pipeline.
  - 3.
  4. and 4. The applicant (as assisted by the EAP) is required to adhere to the minimum public participation requirements, as stated in the EIA Regulations 2014 (as amended). The Department cannot stipulate which newspaper to advertise in, or if the neighbouring residential area can be defined as adjacent or not. The EAP is entrusted with the expertise to conduct public participation that ensures that no Interested and (most importantly) affected party is disadvantaged in terms of being provided a fair opportunity to comment on the proposed project.
5. The applicant is advised to contact the Mossel Bay Local Municipality regarding landowner consent.

Kind regards  
Bathandwa Ncube

---

**From:** Bianca Hagen <BHagen@srk.co.za>  
**Sent:** Friday, August 19, 2022 3:35 PM  
**To:** Bathandwa Ncube <BNcube@dffe.gov.za>  
**Cc:** Dian Naicker <DIAN.Naicker@petrosa.co.za>; Mfanimpela Shabangu <MFANIMPELA.Shabangu@petrosa.co.za>; Ashleen Julius <ASHLEEN.Julius@petrosa.co.za>; Lauren Elston <LElston@srk.co.za>; Christopher Dalgliesh <CDalgliesh@srk.co.za>; Masina Morudu <memorudu@dffe.gov.za>  
**Subject:** PetroSA DFFE Pre-application meeting: Proposed Bypass Pipelines and Repositioning of Single-Point Mooring (SPM) Buoy, Mossel Bay

Dear Bathandwa,

**RE: Proposed Bypass Pipelines and Repositioning of Single-Point Mooring (SPM) Buoy, Mossel Bay**

Please find attached Meeting Notes for the Pre-Application Meeting that took place for the above-mentioned project on 11 August 2022 along with the Final Site Sensitivity Report.

In summary, we please request confirmation in writing from the Department on the following:

1. If the specialist studies indicated in the Site Sensitivity Report proposed to be undertaken are sufficient;
2. Whether maintenance activities for the existing pipeline can be included in the Environmental Management Programme (EMPr) for the project;
3. If advertising in a local newspaper will suffice (no regional or national newspaper required);
4. If physical letter drops / postal notification to residents (in terms of the 2014 Environmental Impact Assessment (EIA) Regulations) is required (since there are no adjacent landowners); and
5. Who the contact person at the Department of Forestry, Fisheries and the Environment (DFFE) is to obtain landowner consent.

We would greatly appreciate it if you could provide a response to item 1 above (via email will suffice) in the meantime so we can appoint the necessary specialists to commence work without further delay.

King Regards,  
Bianca

**Bianca Hagen** Candidate EAP (EAPASA); BSc (Hons) (BDE); MPhil (EnvMngt)



## Environmental Consultant

SRK Consulting (South Africa) (Pty) Ltd.

The Administrative Building, Albion Spring, 183 Main Road, Rondebosch, 7700, Cape Town, South Africa  
Postnet Suite #206, Private Bag X18, Rondebosch, 7701, Cape Town, South Africa

**Tel:** +27 (0)21 659 3060; **Fax:** +27 (0)21 685 7105

**Mobile:** +27 (0)84 512 2100; **Direct:** +27 (0)21 659 3079

**Skype for Business:** [hagb@srk.co.za](mailto:hagb@srk.co.za)

**Email:** [bhagen@srk.co.za](mailto:bhagen@srk.co.za)

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