

Date: 29 March 2021

Our Ref: E-BL01.200446

Email reply to: ppprbay.triplo4@gmail.com / hantie@triplo4.com

Attention: Ms Briega Williams – South African Heritage Resources Agency (SAHRA)

Subject: RE: Comments on the proposed Gas to Power powership project at the Port of Richards Bay

Dear Ms Williams,

Thank you for SAHRA's participation and comments on the draft EIA Report of 9 March 2021.

The description of the project in your letter is correct, but please just note that the length of the preferred route for the gas pipeline is approx. 1700m long (and not 1400m as stated), as indicated in Section 3.2.2 of the draft EIA Report – Gas pipeline alternatives.

I confirm Triplo4 did receive and consider SAHRA's comments on the Draft Scoping Report, and a response was provided to SAHRA at the time (November 2020), indicating that the Heritage Impact Assessment (HIA) Report had included the laydown area for the gas pipelines (to be located near the starting point of the transmission line), and that no findings were reported. This response had specifically addressed your comment that *"the laydown area for the pipeline must be surveyed for heritage resources prior to the laying of the pipeline"*, by clarifying that the laydown area for the pipeline had already been assessed in the Heritage Study.

In addition, SAHRA comments received as part of Scoping were considered in drafting the EIA Report and mitigation measures were included in the draft EMP to address SAHRA's concern that *"there is still a chance that historic remains could be uncovered during the works. In this case all works must cease and may not commence until SAHRA has been contacted to advise the way forward"*. Sections 7.3.10 and 7.6.21 deal with management and protection of Heritage Resource, and the various mitigation actions that have been recommended include the following –

- If an artefact on site is uncovered, work in the immediate vicinity must be stopped immediately.
- Approval must be obtained from the provincial heritage authority, should there be the need to demolish any sites of archaeological and cultural significance. Demolition / construction work must only commence once the provincial heritage authority's approval has been obtained.

- Work may only resume once clearance is given in writing by an archaeologist.

As stated in your comments on the draft EIA Report, the possibility of any impact on maritime heritage resources is considered low. Similarly so, the HIA found the following, as reported in figures 5-8, page 16 last 2 paragraphs of the HIA Report (contained in Appendix I to the draft EIA report):

- The area where the Powerships will be moored is a newly dredged part of the harbour, where several meters of marine deposit were removed approx. 10 years ago.
- In addition, the harbour was built in 1970s (previously it was a dense swampland) and there was no maritime activity as there was no way for ships to enter the river mouth.
- It is further emphasised by the Heritage specialist that the entire area was removed and rebuilt and there cannot be any underwater features and no maritime heritage in this area.

For completeness and better clarity as you have requested, the above points referring to the maritime heritage will be added to the final EIAR in Section 4.2.1 (Baseline – cultural heritage), as well as Section 8.3.13 (Specialists’ Findings and Recommendations – Cultural Heritage (including Archaeology) and Palaeontology). The mitigations measures within the EMPr will also be further revised to clearly indicate reference to both terrestrial and maritime heritage.

We trust this response addresses SAHJAR’s comments and provides the necessary clarity that based on historic information as well as site visit conducted by a Heritage specialist, *“there cannot be any underwater features and no maritime heritage in this project area”*. In the unlikely event however, that maritime heritage is encountered during the construction phase, the necessary mitigation measures have been included in the EMPr for implementation.

Thank you again for your participation and I trust this response addresses all your enquiries. Please do not hesitate to contact us should you have any further queries.

Yours sincerely,



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