

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
South African Heritage Resources Agency | 111 Harrington Street | Cape Town
P.O. Box 4637 | Cape Town | 8001
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Enquiries: Ruan Brand
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CaseID: 19936

Date: Monday November 07, 2022
Page No: 1

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

Ruan Brand
Heritage Officer
South African Heritage Resources Agency

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

Repairs/Modifications to Existing PetroSA Pipeline (Mossel Bay)

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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.