

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
www.sahra.org.za

Enquiries: Briege Williams
Tel: 021 462 4502
Email: bwilliams@sahra.org.za

Date: Tuesday December 15, 2020
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CaseID: 15838

Interim Comment

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

Attention: Dr Chantel Bezuidenhout
Coastal & Environmental Services - Port Elizabeth

The Coega Development Corporation (CDC) plans to establish marine pipeline servitudes in which current and future investors in the Coega Special Economic Zone (SEZ) can establish infrastructure to abstract seawater and discharge treated effluent as required by various industrial processes. More than one servitude will be established, based on the findings of the marine dispersion modelling that has been done. The project entails the selection of the servitude areas, as well as the construction and establishment of associated infrastructure in the marine environment and on land, including pipelines, pump stations, holding reservoirs (PRDW 2020). As part of the Environmental Impact Assessment (EIA), an Underwater Archaeological Impact Assessment (UAIA) needed to be undertaken to identify sensitive cultural heritage sites in the affected environment. The aim of the survey was to attempt to locate, identify, evaluate and document potential underwater and cultural heritage sites within the designated area.

The South African Heritage Resources Agency (SAHRA) would like to thank you for submitting the Draft Environmental Scoping Report for the Marine Intake and Outfall Infrastructure Servitude Project, Zone 10, Coega SEZ, Eastern Cape Province, South Africa.

The purpose of the marine intake and outfall infrastructure and servitudes project is for the provision of seawater to various industries (aquaculture, power provision and desalination) via a number of seawater intakes and the discharge of treated effluent into the marine environment. As such, infrastructure related to this project needs to be constructed along the coast adjacent to the Coega SEZ.

The Draft Scoping report notes that a Maritime Heritage Impact Assessment (MHIA) is needed, SAHRA supports this and is pleased to see that an MHIA has been submitted as part of the supporting documents.

The MHIA consists of a desk-based assessment of the area as well as a magnetometer and divers survey. While the desk-based research noted that Algoa Bay has historically been a busy area with lots of reported wrecks, none are reported as being directly within the survey area, though the co-ordinates are not always



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accurate. The magnetometer survey picked up a few anomalies which were investigated by divers but these were either modern debris or could not be located. The poor conditions also meant that the anomalies closer into the shore could not be inspected. There was no evidence of cultural resources recorded during the survey.

The recommended management measures in Section 10 of the MUCHIA are supported by SAHRA and must be implemented during the project. The Scoping Report and subsequent Environmental Impact Assessment must make reference to the MUCHIA and the potential for previously unknown maritime heritage resources to be uncovered during the works. The Scoping Report and subsequent Environmental Impact Assessment must be submitted to SAHRA via the South African Heritage Resources Information System (SAHRIS) for comment.

SAHRA has noted a few inaccuracies in the Draft Scoping Report which need to be addressed in any subsequent documents.

The table under Section 6.3 Assessment of Issues lists potential issues and possible mitigation measures. In the table on page 138 under the Issue of Impacts on Archaeological, Palaeontological and Cultural Sites, the mitigation measure reads

- *“Should any archaeological or cultural sites or objects be located during the construction of the proposed project, it should immediately be reported to the National Heritage Council. Failure to report a site or object of archaeological and/or cultural significance is a contravention of the National Heritage Act (Act No. 25 of 1999)”*

The responsible agency is SAHRA and not the National Heritage Council so this section needs to be revised to reflect that any discoveries must be reported to SAHRA.

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In Appendix 1.1-3 and also in Appendix 1.2-3 the contact persons for SAHRA are incorrect and need to be updated, the correct details are as follows:

Lesa la Grange (Manager: MUCH unit)	South African Heritage Resources Agency (SAHRA)	llagrange@sahra.org.za	021 202 8658	111 Harrington Cape Town 8001
Briege Williams (Heritage Officer: MUCH unit)		bwilliams@sahra.org.za	021 202 8688	

Please amend both sections accordingly.

Should you have any further queries, please contact the designated official using the case number quoted above in the case header.

Yours faithfully

Briege Williams
Heritage Officer
South African Heritage Resources Agency

Lesa la Grange
Manager: Maritime and Underwater Cultural Heritage

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South African Heritage Resources Agency

ADMIN:

Direct URL to case: <http://www.sahra.org.za/node/546724>

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.