

**The proposed Coega Development Corporation (CDC) Gas to Power project:  
Proposed Gas Infrastructure, Eastern Cape Province.**

**Our Ref:**



an agency of the  
Department of Arts and Culture

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Date: Thursday March 23, 2023

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CaseID: 20790

## **Interim Comment**

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

Attention: Coega Development Corporation (Pty) Ltd

Private Bag X6009  
Port Elizabeth  
6000

**\*PREVIOUS SAHRIS APPLICATION CASE ID 16279\* The Coega Development Corporation (CDC) proposes to develop a Gas to Power project, including three power plants and associated infrastructure, within the Coega Special Economic Zone (SEZ) in the Eastern Cape Province. An EIA process was undertaken in 2020/2021 (DFFE Ref: 14/12/16/3/3/2/1131) for the Coega Gas to Power Infrastructure project, and the Final Scoping Report was accepted by DFFE on 6 January 2021. Ultimately though, environmental authorisation was refused due to incorrect proof of landowner consent and insufficient information within the EIR for the Department to make a decision.**

The South African Heritage Resources Agency (SAHRA) would like to thank you for submitting the Draft Environmental Impact Assessment (DEIA) for the Proposed Coega Development Corporation (CDC) Gas to Power Project: Proposed Gas Infrastructure, Eastern Cape, South Africa.

The process for this project was initially started in 2021 and SAHRA received and approved the application on SAHRIS (Case ID 16279) in May of that year, however, it was ultimately refused Environmental Authorisation by the Department of Forestry, Fisheries and the Environment (DFFE) in August 2021. As the project is being applied for under a new DFFE reference number, a new case was duly created on SAHRIS.

The proposed gas infrastructure will consist of all key supporting infrastructure required for the operation of the CDC's proposed gas to power plants in the Coega SEZ. The key infrastructure which falls under the remit of the Maritime and Underwater Cultural Heritage (MUCH) unit is:



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- Two floating storage and regasification units (FSRU), moored in the port, which will receive, store and regasify the LNG from the LNG carrier (LNGC).
- A new jetty with offloading platform and berthing facilities for the FSRU and LNGC in the Port of Ngqura.
- Gas pipelines from the FSRU and jetty to the proposed powerplants.
- Pipelines for the transmission of seawater from the abstraction point in the port to Zone 10.
- Dredging within the port and a disposal area for the dredged material.

In Section 4.8 of the DEIA regarding the National Heritage Resources Act (No.25 of 1999), a paragraph must be included to note that SAHRA is the responsible authority for the implementation of the act and whereas terrestrial heritage can be devolved to provincial level, any development below the high water mark falls solely under the remit of the MUCH unit at SAHRA.

As part of the project an Archaeological Impact Assessment (AIA) and Palaeontological Heritage Assessment were undertaken for the terrestrial based activity to assess any possible impacts on heritage, though no work was undertaken to assess any maritime impacts. Section 5.1.11 of the DEIA outlines the findings of these reports, with the only reference being made to maritime heritage being taken for a previous comment issued by SAHRA (Case ID 16279).

The proposed development for the FSRUs, jetty and pipelines all take place within the port on the inside of the existing modern breakwater, this area has seen a high level of activity as the Port of Ngqura is a recent development. Localised dredging will be undertaken to accommodate the port manoeuvring area, this dredging will be with an area that has been previously dredged.

During the development of the port in 2004, the wreck of the County of Pembroke was uncovered. This vessel wrecked in 1903 when she ran aground in Algoa Bay during a storm, her hulk was later moved further around the bay, near to the location of the modern port, and sunk. When the remains of the wreck were discovered, she was the subject of emergency archaeological recording before being blown up and removed.

Despite the discovery of a shipwreck during construction of the port, subsequent further development and dredging of the area means that the MUCH unit at SAHRA considers the possibility of any impact on maritime heritage resources to be low.

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Section 10.8.1 of the DEIA addresses the recommendations made by the EAP in relation to the project. Bullet point 3 on page 165 of the report states that "*After vegetation clearing a report must be sent to SAHRA for review and guidance on the way forward*" please note that this recommendation has never been requested by SAHRA and should be removed from the report.

The other mitigation measures outlined in this section are supported by SAHRA and must be adhered to should any heritage resources come to light.

On page 63 under Section 5.1.11.2 at the beginning of the last paragraph SAHRA is listed as the South African Heritage Resources Association, please change this to read South African Heritage Resources Agency.

On page 198 in the Stake Holder Database, the first name listed in the table is a Ms Mncwabe-Mama whose company is stated as South African Heritage Resources Agency (SAHRA), please note that this is incorrect as there is no one at SAHRA by that name, this must be corrected.

Please note that all updates or changes to the project, all supporting documents, correspondence, and reports relating to the work must be uploaded to the case on SAHRIS in order to provide SAHRA with the opportunity to comment.

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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Briega Williams  
Acting manager  
South African Heritage Resources Agency

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

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**ADMIN:**

Direct URL to case: <https://sahris.sahra.org.za/node/614104>  
(DFFE, Ref: 14/12/16/3/3/2/2265)

**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.