

Our Ref:



an agency of the  
Department of Arts and Culture

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South African Heritage Resources Agency | 111 Harrington Street | Cape Town  
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CaseID: 16279

Date: Wednesday April 14, 2021  
Page No: 1

## Interim Comment

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

Attention: Sadick Davids

Coega Development Corporation (Pty) Ltd  
Corner Alcyon & Zibuko St, Zone 1, Coega SEZ, Port Elizabeth, 6100

**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). SRK Consulting (South Africa) (Pty) Ltd (SRK) has been appointed by CDC, as the independent environmental consultants to assess the environmental impacts of the proposed development according in terms of the National Environmental Management Act 107 of 1998 (NEMA) 2014 Environmental Impact Assessment (EIA) Regulations. The overall project would broadly involve the following components: • A Liquefied Natural Gas (LNG) terminal, consisting of a berth with off-loading arms within the Port of Ngqura, cryogenic pipelines, storage and handling facilities and re-gasification modules (both on and off-shore); • Gas pipelines and distribution hub, for the transmission, distribution and reticulation of natural gas within the Coega SEZ and Port of Ngqura; • Three Gas to Power plants, each with a 1000 MW generation capacity (specific generation technologies may vary); and • Electricity transmission connecting powerlines to evacuate electricity to the previously approved 400 kV lines in the SEZ**

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

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:

- Two floating storage and regasification units (FSRU), moored in the port, which will receive, store and regasify the LNG from the LNG carrier (LNGC).



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- A new jetty with offloading platform and berthing facilities for the FSRU and LNGC in the Port of Ngqura.
- Gas and cryogenic 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.

SAHRA has noted in section 3.5.7 of the DEIA that the *“Infrastructure for the intake and discharge of seawater for heating purposes is excluded from the scope of this EIA process and will be addressed by the CDC’s Marine Pipeline Servitude EIA process that is currently underway.”* Therefore this part of the development is not addressed within this comment.

It is further noted that the preferred site for offshore disposal of dredged spoil falls under an existing authorisation for an earlier EIA which will also not be addressed in the comment.

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 and therefore it is unlikely that any heritage remains will be uncovered.

As part of the project a Heritage Impact Assessment (HIA) was undertaken for the terrestrial based activity to assess any possible impacts on heritage, though no work was undertaken to assess any maritime impacts.

In 2004 during the development of the port, the wreck of the County of Pembroke was uncovered. She wrecked in 1903 when she ran aground in Algoa Bay during a storm, her hulk was later moved further around the bay 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 6.6.5 of the DEIA addresses management and mitigation measures relating to heritage during the construction phase of the project, however these measures do not include any reference to maritime heritage. SAHRA insists that maritime heritage is addressed in these measures so that people working on site are aware that maritime heritage could be encountered. As maritime heritage is a national competence, should historic remains be uncovered during the project, all works must cease and may not commence until SAHRA has been contacted to advise the way forward.

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  
Heritage Officer  
South African Heritage Resources Agency

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

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**ADMIN:**

# Proposed Coega Integrated Gas-to-Power Project: Gas Infrastructure

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Direct URL to case: <https://sahris.sahra.org.za/node/567142>

## 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.