

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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Enquiries: Briega Williams
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CaseID: 15688

Date: Tuesday March 09, 2021
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Interim Comment

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

Attention: Triplo4 Sustainable Solutions (Pty) Ltd

Power generating ship and related powerlines, Richards Bay, KZN

The South African Heritage Resources Agency (SAHRA) would like to thank you for submitting the Draft Environmental Impact Assessment Report and Draft Environmental Management Programme for the Proposed Gas to Power via Powership Project at Port of Richards Bay, uMhlathuze, KwaZulu-Natal, South Africa.

The project entails the generation of electricity from floating mobile powerships moored in the Port of Richards Bay including three ships berthing during the project lifespan namely a Floating Storage Regasification Unit (FSRU), and two Powerships. A subsea gas pipeline will connect the FSRU to the powership and a transmission line from the powership will feed the substation and national grid.

Although most of the proposed project is land based, the Maritime and Underwater Cultural Heritage (MUCH) unit is required to comment on the proposed subsea gas pipeline. There are two proposed alternative routes for the pipeline, route 1 (the preferred route) is approximately 1400m long and the 2nd alternative is 500m long. The pipeline will be brought to site in sections and assembled ready for installation though the installation method has yet to be established.

SAHRA commented on the Draft Scoping Report (DSR) in November 2020 where it was noted that although a Heritage Impact Assessment (HIA) had been undertaken to assess any possible impacts on terrestrial heritage, no work was undertaken to assess any impacts on maritime heritage. Despite this, the MUCH unit at SAHRA considered the possibility of any impact on maritime heritage resources to be low due to the extensive development of the area in previous years and so it was recommended that *"...the laydown area for the pipeline must be surveyed for heritage resources prior to the laying of the pipeline. Should the survey data reveal any resources of interest, input on mitigation of impacts to such resources must be sought from a suitably qualified specialist."* SAHRA also advised 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*

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contacted to advise the way forward."

SAHRA is disappointed to note that both the DEIA and DEMPr make no reference to maritime heritage despite part of the project being below the high-water mark. SAHRA's comments which were provided for the DSR phase of the project have not been considered for inclusion in the DEIA.

While the possibility of encountering maritime heritage is considered to be low, it must be referenced in the EIA so that should heritage resources be encountered during the proposed work, then the correct protocol will be followed.

SAHRA insists that a paragraph must be inserted under section 8.3.13 (Cultural Heritage (including archaeology) and Palaeontology) to note the need for input on mitigation of impacts to maritime and underwater cultural heritage resources should they be discovered during the pipeline laydown area survey. Section 4.2.1 must also refer to Maritime heritage to show that its presence has been considered.

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

Yours faithfully

Briega Williams
Heritage Officer
South African Heritage Resources Agency

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

ADMIN:

Direct URL to case: <https://sahris.sahra.org.za/node/543517>

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.