

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: Briege Williams
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CaseID: 15688

Date: Tuesday March 30, 2021
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Letter

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 the letter issued in response to SAHRAs comment for the Draft Environmental Impact Assessment Report and Draft Environmental Management Programme for the Proposed Gas to Power via Powership Project at the Port of Richards Bay, uMhlatuze, KwaZulu-Natal, South Africa.

In the comment dated March 2021, SAHRA raised a number of concerns regarding the issue that Maritime and Underwater Cultural Heritage (MUCH) has not been properly addressed or referred to in the DEIA or the DEMPr. The letter of response from Triplo4 has aimed to address these concerns, however, SAHRA still feels that the presence of Maritime and Underwater Cultural Heritage has not been properly considered.

In paragraph 2 of the letter in response to the section of SAHRAs comment that reads "*the laydown area for the pipeline must be surveyed for heritage resources prior to the laying of the pipeline*", the letter states that "*the laydown area for the pipeline had already been assessed in the Heritage Study*" and that "*the Heritage Impact Assessment (HIA) Report had included the laydown area for the gas pipelines (to be located near the starting point of the transmission line), and that no findings were reported.*" However, neither the HIA nor the DEIA make any reference to there being any investigation of any of the proposed pipeline below the high-water mark, ie the subsea pipeline, both reports only refer to land based investigations and do not specifically mention the marine pipelines. The HIA report had included the laydown area for the gas pipelines (to be located near the starting point of the transmission line) but this is not addressing the below water impacts.

Paragraph 3 of the letter states that "*Sections 7.3.10 and 7.6.21 deal with management and protection of Heritage Resource*" and that various mitigation actions that have been recommended, however, maritime archaeology is not specifically mentioned and SAHRA is not listed as the contacting authority which deals underwater cultural heritage.

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Paragraph 4 of the letter refers to the HIA report, specifically Figures 5-8 which show the land based power lines, however these figures do not show the route for the below water gas pipeline. Had the proposed gas pipelines been added to these maps, it would show that the proposed laydown area has not been swampland for some time and was in fact an open water lagoon as shown on the 1937 aerial photograph. While the area has been subject to dredging and other impacts during the development of the port, it is inaccurate to say that there cannot be any maritime heritage in this area. The history of Richards Bay shows that there has been maritime activity in the area for some time and was considered numerous times for harbour development.

SAHRA appreciates the response given in paragraph 5 which states that sections 4.2.1 and 8.3.13 of the DEIA will be updated to include references to maritime heritage and that mitigation measures in the DEMPr will also be revised to refer to maritime heritage.

SAHRA would like to emphasise that while the presence of maritime heritage along the route of the subsea cables is considered low, there still needs to be a reference to it in both the DEIA and DEMPr. Currently there is no mention of maritime heritage at all in either report however SAHRA is pleased to note that the Environmental Practitioner has stated that the relevant sections, as requested by SAHRA (4.2.1 and 8.3.13), will now be updated.

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.