

Our Ref:



an agency of the  
Department of Arts and Culture

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CaseID: 15688

Date: Thursday November 17, 2022  
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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 revised Draft Environmental Impact Assessment (EIA) report for the Proposed Gas to Power via Powership Project at the Port of Richards Bay, uMhlatuze, KwaZulu-Natal, South Africa.

SAHRA previously issued a final comment for this project in April 2021 and Closed (approved) the case, however, the application for Environmental Authorisation was refused. After various stages of appeal, it has been noted that DFFE has advised that an updated EIA, addressing the various gaps in information, and subject to a Public Participation Process (PPP), must be submitted to the Competent Authority for reconsideration. SAHRA was advised of the new process on 24<sup>th</sup> October 2022 and informed the applicant that updated documents must be uploaded onto the existing case on SAHRIS so that they can be reviewed for any changes that may impact any heritage resources. The relevant documents were uploaded onto SAHRIS on 10<sup>th</sup> November 2022.

SAHRA has reviewed the DEIA and has noted that the sections relating to heritage, namely Sections 7.5.6 and 7.5.10 have been updated from the previous version (April 2021) and have been changed so that they now do not adequately address heritage resources.

During the previous Environmental Authorisation process undertaken for this project in 2020-2021 SAHRA commented on the EIA documents. The Final EIA issued in April 2021 addressed all of SAHRA's requirements regarding heritage and SAHRA supported the assessment of heritage and the recommendations. In particular, Section 8.3.14 of that EIA was noted as appropriately covering the aspects of heritage and making recommendations for mitigation measures should any heritage resources be disturbed. These recommendations are also included in the HIA and are:

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- A chance find protocol will be initiated during construction.
- Although not anticipated, should maritime archaeology be discovered, SAHRA, as the contacting authority which deals underwater cultural heritage, must be contacted immediately, and approval must be obtained should there be need to demolish or remove such maritime archaeology site. Demolition / construction work may only commence or continue once SAHRA's approval has been obtained.

These recommendations have not been included in the current draft EIA (Nov 2022) which is surprising as these were previously requested and subsequently approved by SAHRA in 2021 and are included in the HIA written by the specialist.

SAHRA therefore insists that the information contained in Section 8.3.14 of the April 2021 FEIA be reinstated to this report to meet requirements. It is requested that sections 7.5.6 and 7.5.10 be updated to include the information from the above noted section.

The recommendations must also be included in any EMPr produced for the project.

Should any shipwrecks be identified as part of this project then SAHRA must be notified to enable the information to be added to the national shipwreck database. Any new discoveries or updated data is a valuable resource in adding to our knowledge of South Africa's maritime history.

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 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/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.