

Our Ref:



an agency of the
Department of Arts and Culture

T: +27 21 462 4502 | F: +27 21 462 4509 | E: info@sahra.org.za
South African Heritage Resources Agency | 111 Harrington Street | Cape Town
P.O. Box 4637 | Cape Town | 8001
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Enquiries: Briega Williams
Tel: 021 462 4502
Email: bwilliams@sahra.org.za
CaseID: 15688

Date: Tuesday December 20, 2022
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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 November 2022 in response to SAHRAs comment for the Draft Environmental Impact Assessment Report for the Proposed Gas to Power via Powership Project at the Port of Richards Bay, uMhlathuze, KwaZulu-Natal, South Africa.

In the comment dated November 2022, SAHRA noted that the sections relating to heritage, namely Sections 7.5.6 and 7.5.10 had been updated from the previous version (April 2021) and had been changed so that they do not adequately address heritage resources. SAHRA requested that the information contained in Section 8.3.14 of the April 2021 FEIA be reinstated to this report to meet requirements and also advised that sections 7.5.6 and 7.5.10 be updated to include the information from the above noted section. It was also noted that the Heritage Impact Assessment (HIA) recommended 2 mitigation measures to be included in the EIA as advised by the specialist (as stated on pages 23 and 31 of the HIA).

In November 2022 SAHRA received a letter from Triplo4 in response to the above comment where it stated that *“heritage impacts, including underwater heritage, were considered and captured in the draft EIA Report, in sections 7.5.6 and 7.5.10. In terms of the Underwater Archaeology, it was determined that there is an extremely low probability of Maritime and Underwater Cultural Heritage resources being found in the Port of Richards Bay. It was further indicated that the specialist recommended the need for input in the EMPr on mitigation of impacts to maritime and underwater cultural heritage resources should they be discovered during the pipeline laydown area survey.”*

SAHRA disagrees with this statement and insists that the mitigation measures must be included in the EIA, as supported by the HIA from the heritage specialist, and the issued comment from November 2022 must be adhered to.

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Heritage is often an overlooked and ignored resource and measures must be put in place to protect these finite resources should any come to light.

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

Yours faithfully

Briege Williams
Heritage Officer
South African Heritage Resources Agency

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.