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Environmental Authorisation Number: 14/12/16/3/3/2/705

23 August 2020

Dear Dale

AMENDMENTS TO THE DYASONSKLIP SEF1

The client, Dyasonsklip Solar Energy Facility 1 (Pty) Ltd, have proposed an amendment to the Dyasonsklip Solar Energy Facility 1 on the Remainder of the farm Dyason's Klip 454 in the Kai Garib local Municipality, Northern Cape.

The Environmental Authorisation (EA) from the Department of Environmental Affairs is dated 03 September 2015. A copy of the EA has been provided. No specific recommendations were made on Heritage/Archaeology in the EA. As per condition 68 of the EA "The recommendations of the EAP in the EIAR dated March 2015 and the specialist studies attached must be adhered to. In the event of any conflicting mitigation measures and conditions of the Environmental Authorisation, the specific condition of this Environmental Authorisation will take preference". I have assessed the proposed amendments and compared them to the results of the archaeological survey of the 17th/18th October 2014.

1. PROPOSED AMENDMENTS

The amendment involves the following:

- The construction of a Battery Energy Storage System (BESS), covering an area of approximately 4ha, adjacent to the on-site substation. The batteries will require a solid foundation/plinths which means that the ground surface will be levelled.



Figure 1: Position of the proposed BESS (in pink).

2. WILL THE AMENDMENTS RESULT IN CHANGES TO THE NATURE OR SIGNIFICANCE OF THE HERITAGE IMPACTS?

The 2014 layout has avoided impacts to majority of heritage sites (including archaeological sites) identified in the HIA (November 2014). No new heritage impacts have been identified as a result of the proposed 2020 amendments. The proposed battery facility will be in proximity to archaeological sites D012, D013 and L019 (indicated with red dots).

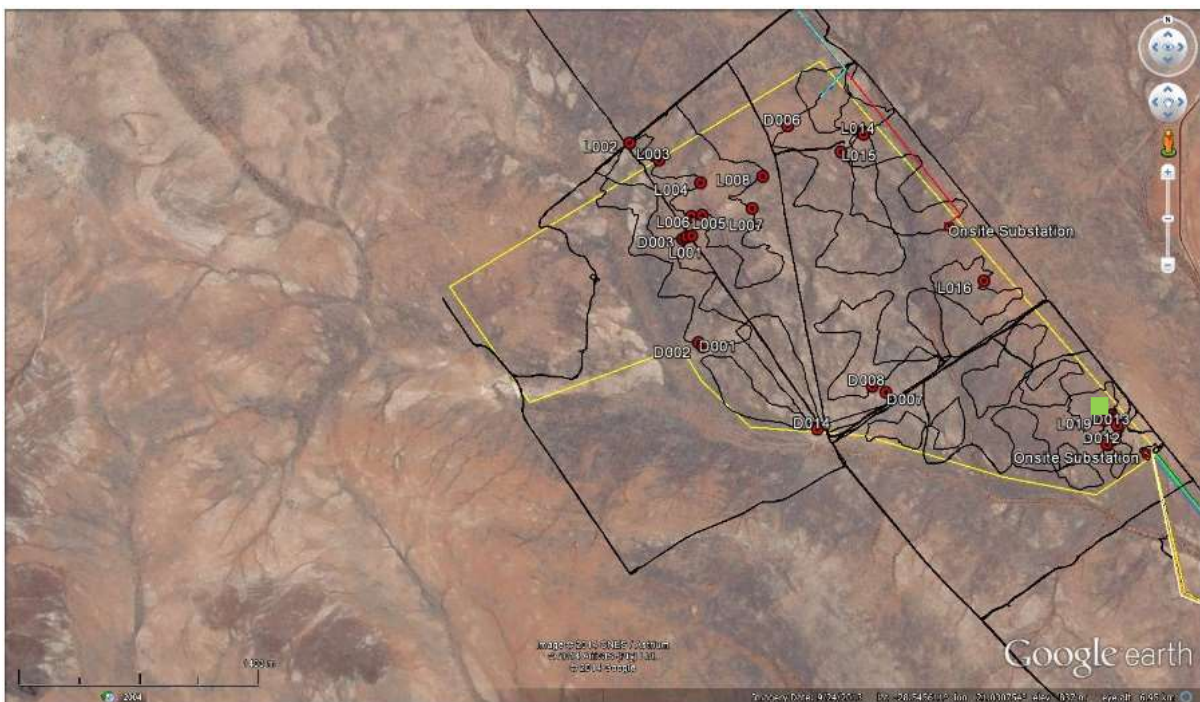


Figure 2: Location of BESS (green) with respect the survey paths and recorded sites (Google Earth image from 2014).

The sites were respectively listed as scatters of quartz and banded ironstone artefacts (MSA) near a small dry stream (D012 and D013) and are of low significance. L019 are described as

DR LITA WEBLEY HERITAGE PRACTITIONER

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two very small cairns (only 50cm x 50cm in size). It seemed unlikely that these cairns represented burials due to their small size. However, they were identified as potentially having a “high” significance, since burials are always considered to be sensitive and of high significance. The SAHRA Final Comment (25 March 2015) confirms that it is unlikely that the stone cairns represent burials.

3. WILL THE AMENDMENTS RESULT IN ANY ADDITIONAL IMPACTS NOT PREVIOUSLY ASSESSED IN THE STUDY?

Since grave sites are located under the soil surface and are only exposed once the construction commences, it is possible, although unlikely, that the cairns may represent burials. It is essential that the EMPr makes provision for the recovery of archaeological material which may be uncovered during construction.

The impacts identified and assessed previously remain unchanged.

4. WHETHER THE AMENDMENTS WILL REQUIRE ANY ADDITIONAL MANAGEMENT OUTCOMES OR MITIGATION MEASURES?

The following recommendations were made in the HIA report which was submitted the South African Heritage Resources Agency in 2014:

- If any archaeological remains, including human remains, are uncovered during construction, then work must stop in that area and the responsible heritage authorities (SAHRA) must be notified.

The following additional recommendations are made to include in the EMPr:

The Environmental Control Officer must be present during the ground clearance of the BESS to ensure that any archaeological sites/graves, can be identified and that suitable mitigation measures can be implemented as required.

5. MOTIVATION: NO FURTHER STUDIES ARE REQUIRED

I, Lita Webley, have reviewed the proposed amendment to the environmental authorisation. My impact ratings for the proposed development have not been changed with the proposed amendments.

Yours Sincerely



Dr Lita Webley

DECLARATION OF INDEPENDENCE

DR LITA WEBLEY HERITAGE PRACTITIONER

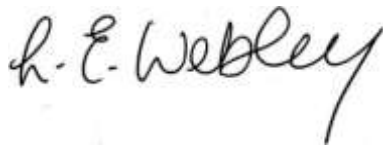
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I, Lita Webley, declare that –

- I act as the independent specialist in this application;
- I will perform the work relating to the application in an objective manner, even if this results in views and findings that are not favourable to the applicant;
- I declare that there are no circumstances that may compromise my objectivity in performing such work;
- I have expertise in conducting the specialist report relevant to this application, including knowledge of the Act, regulations and any guidelines that have relevance to the proposed activity;
- I will comply with the Act, regulations and all other applicable legislation;
- I have no, and will not engage in, conflicting interests in undertaking of the activity;
- I undertake to disclose to the applicant and the competent authority all material information in my possession that reasonably has or may have potential of influencing – any decision to be taken with respect to the application by the competent authority; and – the objectivity of any report, plan or document to be prepared by myself for submission to the competent authority;
- All the particulars furnished by me in this form are true and correct; and
- I realise that a false declaration is an offence in terms of regulation 71 and is punishable in terms of section 24F of the Act.

Signature of specialist

A handwritten signature in black ink that reads "L. E. Webley". The signature is written in a cursive style with a long, sweeping tail on the letter 'y'.

Specialist carrying out the application

Dr Lita Webley