

Ms. Natasha Higgitt
South African Heritage Resources Agency (SAHRA)
111 Harrington Street
CAPE TOWN
8001

Your reference 1714
Our reference 13993
Date 14th September 2017

ATTENTION: MS. NATASHA HIGGITT

Dear Ms. Higgitt

MOOKODI INTEGRATION PHASE 2 – PROPOSED CONSTRUCTION OF THE MOOKODI-GANYESA 132KV POWER LINE, PROPOSED GANYESA SUBSTATION, AND HAVELOCK LOOP-IN / LOOP-OUT LINK, NORTH WEST PROVINCE: ENVIRONMENTAL AUTHORISATION AMENDMENT APPLICATION

The South African Heritage Resources Agency (SAHRA) interim comment letter dated 30th August 2017 refers.

As per the comment letter above, it was stated that, “The SAHRA Archaeology Palaeontology and Metoerites (APM) Unit requests that a Palaeontology Impact Assessment (PIA) desktop study be conducted as part of the Amendment Application process for the Mookodi – Ganyesa line and substation. Further comments will be issued upon receipt of the PIA for the Mookodi – Ganyesa application”.

However, as per Condition 27 of the original Environmental Authorisation (EA) dated the 2nd of February 2017, SAHRA originally maintained that “...A Palaeontological Impact Assessment (PIA) must be compiled and submitted to the South African Heritage Resources Agency for approval *prior to construction activities*” (*Emphasis added*).

Eskom were therefore of the understanding that the PIA would be undertaken accordingly prior to construction for SAHRA to provide final comment and include any additional measures (if and where required) into the Environmental Management Programme (EMPr) to be implemented in the construction phase. Eskom therefore acknowledged and made provision on this basis to undertake this assessment further into the process but prior to construction, as required.

However, at this stage in the EA amendment process, comments were submitted by SAHRA after the public review and comment period which was from **Wednesday the 26th July 2017 to Friday the 25th August 2017**. As such, the Final Motivation Amendment Report has already been finalised, printed and was due to be submitted early September 2017. Note that in terms of Environmental Impact Assessment Regulations (2014) timeframes for the submission of the Final Motivation Amendment Report, this report will need to be submitted before or on the **16th of October 2017**.

In terms of the above, we fear that there may not be sufficient time to procure funds from our client (lengthy process), appoint and undertake the PIA desktop study, integrate these findings into the Final Motivation Amendment Report, submit to SAHRA for comment, await comment from SAHRA, then once received, finalise and print the Updated Final Motivation Amendment Report for submission to the Department of Environmental Affairs (DEA) for decision making by the deadline date.

It is therefore respectfully requested that Eskom are held to honour Condition 27 of the original EA dated the 2nd of February 2017 and that the PIA study be undertaken prior to construction, and submitted to SAHRA for final comment accordingly, as opposed to undertaking the PIA desktop assessment as part of the EA amendment process. This is due to insufficient amount of time available to undertake and integrate the findings of the study prior to the submission deadline in terms of the EIA Regulations (2014), as required.

Your soonest response will be highly appreciated. Should you have any queries, please feel free to contact me.

Yours sincerely



Shaun Taylor
Environmental Scientist
SIVEST Environmental