



Reg. #: 2019/501908/07

ENVIROD GLOBAL SOLUTIONS (PTY) LTD
4 Westmont Complex
Birchwood Street Sonkring
Brakenfell
Western Cape
7560

March 04, 2020

SOUTH AFRICAN HERITAGE RESOURCES AGENCY (SAHRA)
HEAD OFFICE
111 HARRINGTON STREET
CAPE TOWN
8001

Case ID: 14805

Humble request for clarity in respect of the letter from SAHRA dated 28 February 2020

I hereby acknowledge receipt of your letter dated 28 February 2020 and wish to inform you that the letter is going to be submitted to the Department of Mineral Resources and Energy as per instruction. However, I wish to get clarity on the contents and rationale of the letter in question from SAHRA. Part of the confusion on my side is caused by the following:

1. The fact that, in the letter in question, SAHRA quotes a statement shared with SAHRA when the case was created on SAHRIS, which states that – “Heritage Studies are going to be conducted.” The contents of the letter seem to suggest that SAHRA has not seen this statement;
2. The application to which the letter in question refers is still in the ‘application for Environmental Authorisation stage’, hence Heritage Impact Assessments that comply with section 24(4)b(iii) of the NEMA and section 38(3) or section 38(8) of the NHRA are going to be completed as part of the Environmental Authorisation application as SAHRA has written in bold in the letter in question;
3. The Environmental Report that has been shared with SAHRA thus far is entitled ‘Draft Basic Assessment and Environmental Management Programme Report’. On the contrary, SAHRA, in the letter in question, refers to this shared Draft Report as Final Basic Assessment Report (the intention was to share with SAHRA amended environmental reports at a later stage, after Heritage Impact Assessments had been conducted); and,
4. SAHRA normally issues an interim comment at environmental authorisation application stage before issuing a final comment and the application to which SAHRA refers in the letter in question is still at this stage.



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In light of the above, I hereby enquire about the following:

1. Did SAHRA not make a mistake or an error in the contents of the Final Comment; and,
2. Did SAHRA not make a mistake or an error to issue Final Comment before Initial Comment as per common practise?
3. Did SAHRA consider the statement that Heritage Studies are going to be conducted when making the comment?
4. Did SAHRA consider that the report shared with SAHRA is entitled Draft Basic Assessment and Environmental Management Programme Report when making the comment?

The expectation on the side of Envirod Global Solutions (Pty) Ltd was that SAHRA would make Interim Comment in respect of the case in question at this stage as per common practise.

Yours sincerely,





Envirod
Global Solutions (Pty) Ltd

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