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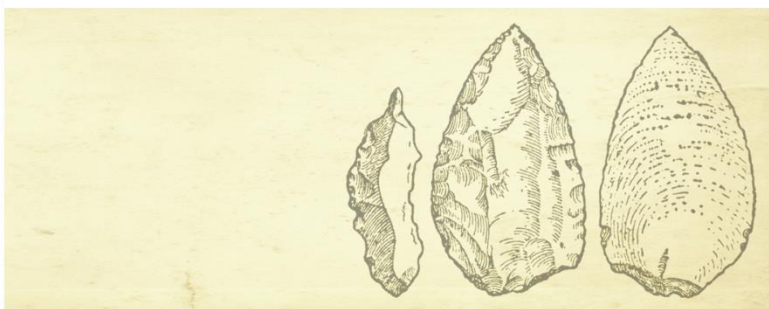
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RE. CaseID: 15050

Rectification of the clearing of land and the construction of vineyards, a dam, pipelines, and associated infrastructure on Erf 2435, 387, 1248 and 2106 Kakamas South Settlement, Northern Cape Province.

2020-07-07

To whom it may concern,

GroenbergEnviro (Pty) Ltd have been appointed by Triple D Farms (Pty) Ltd to conduct a Section 24G Rectification process for the clearing of land and the construction of a vineyard, a dam, pipelines and associated infrastructure on Erf 2435, 387, 1248 and 2106 Kakamas South Settlement, Northern Cape Province (S24G01/04/2020). A Draft S24G Assessment report has been submitted to SAHRA in terms of the National Environmental Management Act, 107 of 1998 (NEMA) and NEMA Environmental Impact Assessment (EIA) Regulations. Activities that had commenced illegally include the clearing of 2.6 ha of indigenous vegetation within 32 m of a stream. Further proposed activities include the construction of a dam, extension of the pump station, 50 ha of vineyard (inclusive of the current illegal 2.6 ha) and internal irrigation pipelines.

As part of the Draft S24G Assessment process, GroenbergEnviro (Pty) Ltd, re-submitted the following Heritage and Palaeontological Impact Assessment reports:

- Engelbrecht, J., & Fivaz, H., 2018. Phase 1 Heritage Impact Assessment, Plot 1178, Kakamas South, Northern Cape, and
- Butler, E., 2018. Recommended Exemption from further Palaeontological Studies: Proposed Agricultural Development, Plot 1178, Kakamas South Settlement, Kai! Garib Municipality.

These reports were compiled for EnviroAfrica cc by UBIQUE Heritage Consultants and Banzai Environmental as part of the EA process as per section 38(3) and 38(8) of the National Heritage Resources Act, Act 25 of 1999 (NHRA) as required by section 24(4)b(iii) of NEMA, to determine the



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impact of the proposed agricultural development on Plot 1178 Kakamas South, on any sites, features, or objects of cultural heritage significance. The site involved was located south of the N14, approximately 2.4 km West of Kakamas South Settlement in the Kai !Garib Local Municipality, Northern Cape. The proposed project entailed the utilisation of approximately 60 ha of land for the development of vineyards for table grape and raisin production by Triple D Farms (Pty) Ltd. The proposed development included fixed infrastructure such as a new pump station on the bank of the Orange River, pipelines, off-stream storage dam (reservoir), filtering system, fuel-depot and generator, a packing shed and labour housing. The proposed pump station and pipelines to the development area were to be located within registered servitudes on Lot 387, 1248 and 2106, Kakamas South Settlement.

Both of the reports submitted to CaseID 15050 were submitted to SAHRIS as CaseID 13315.

After the completion of the HIA reports in September 2018, the following properties were consolidated/integrated (refer to HIA Addendum and additional files uploaded to CaseID 13315) in December 2018 as Plot 2435, Kakamas South Settlement, Kai !Garib Municipality, Kenhardt, Northern Cape Province;

1. Plot 2432 (Portion of Plot 2106), Kakamas South Settlement, Kai !Garib Municipality, Kenhardt, Northern Cape Province, and
2. Remainder of Plot 1178, Kakamas South Settlement, Kai !Garib Municipality, Kenhardt, Northern Cape Province, and
3. Plot 2261 (Portion of Plot 1178), Kakamas South Settlement, Kai !Garib Municipality, Kenhardt, Northern Cape Province.

The project scope for both CaseID 13315 and CaseID 15050 are thus the same and involves the same development footprint.

UBIQUE Heritage Consultants surveyed the proposed development footprint and surrounding areas pertaining to both CaseID 13315 and CaseID 15050 on the 22nd and 23rd of August 2018. Our report concluded that a total of eight (8) surface occurrences of Middle Stone Age/Later Stone Age lithic material of low heritage significance was identified within the proposed development area. No other heritage resources were identified.

Recommendations provided in the report include the following:

- No further mitigation is required.
- If during construction, any possible discovery of finds such as stone tool scatters, artefacts, human remains, or fossils are made, the operations must be stopped, and a qualified archaeologist must be contacted for an assessment of the find.

After a comparison (see Figure 1) between the development footprints of CaseID 13315 and CaseID 15050, UBIQUE Heritage Consultants are satisfied that our initial report for CaseID 13315 is still



relevant for the development area. We conclude that the initial impact assessment covered the 2.6 ha of illegal activity that triggered the S24G application (CaseID 15050).

We recommend that no other further heritage studies are required for CaseID 15050.

Heritage Consultant: UBIQUE Heritage Consultants

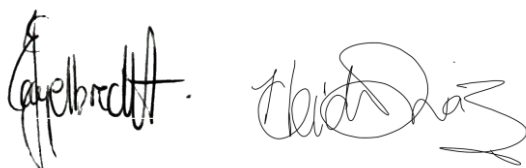
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Declaration of independence:

We, Jan Engelbrecht and Heidi Fivaz, partners of UBIQUE Heritage Consultants, hereby confirm our independence as heritage specialists and declare that:

- we are suitably qualified and accredited to act as independent specialists in this application;
- we do not have any vested interests (either business, financial, personal or other) in the proposed development project other than remuneration for the heritage assessment and heritage management services performed;
- the work was conducted in an objective and ethical manner, in accordance with a professional code of conduct and within the framework of South African heritage legislation.



Signed:
J.A.C. Engelbrecht & H. Fivaz
UBIQUE Heritage Consultants

Date: 2020-07-07



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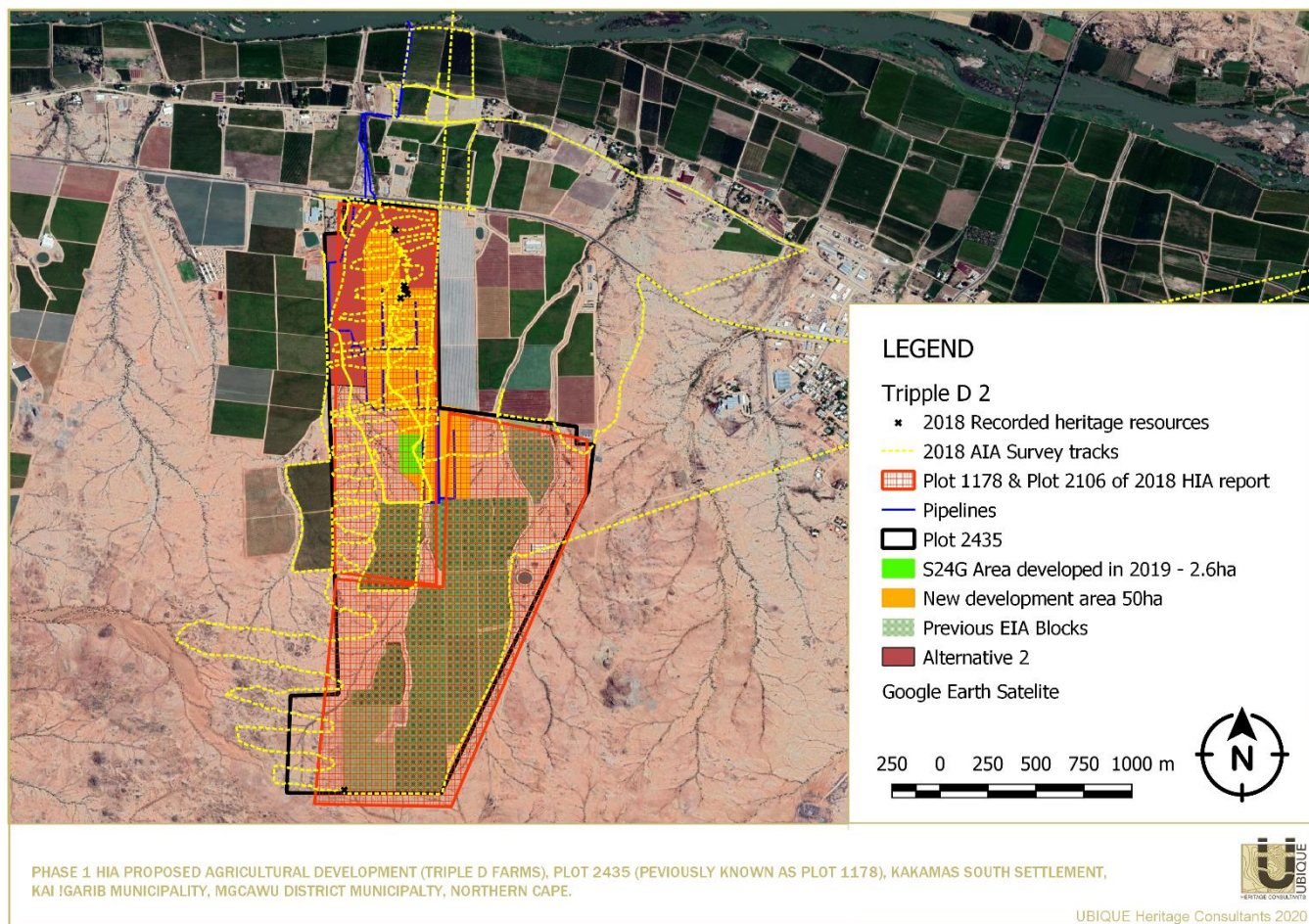


Figure 1 A map that combines the development footprints of *CaseID 13315* and *CaseID 15050* showing the alignment between the study areas. The recorded tracks from the 2018 Phase 1 Heritage Impacts Assessment survey show adequate coverage of the area (indicated in green) under investigation for the Section 24G application.



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