

**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](mailto:info@sahra.org.za)  
South African Heritage Resources Agency | 111 Harrington Street | Cape Town  
P.O. Box 4637 | Cape Town | 8001  
[www.sahra.org.za](http://www.sahra.org.za)

Enquiries: Natasha Higgitt  
Tel: 021 462 4502  
Email: [nhiggitt@sahra.org.za](mailto:nhiggitt@sahra.org.za)  
CaseID: 10347

Date: Monday November 28, 2016  
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## **Interim Comment**

**In terms of Section 38(8) of the National Heritage Resources Act (Act 25 of 1999)**

Attention: Rudzani Ranwedzi

### **DRAFT BAISC ASSESSMENT REPORT FOR THE PROPOSED DEVIATION OF THE ESKOM JUNO-GROMIS 400kV TRANSMISSION LINE, IN THE NORTHERN AND WESTERN CAPE PROVINCES**

Nsovo Environmental Consulting was appointed by Eskom Holdings SOC Limited to conduct a Basic Assessment Process for proposed deviations for the approved Juno-Gromis 400kV Transmission Line. The Transmission Line received a Record of Decision (ROD) from the Department of Environmental Affairs and Tourism on the 6<sup>th</sup> of November 2007. The Transmission Line will be 230 km in length with a 55 m wide servitude. It will run between the Juno Substation located near Vredendal, Western Cape Province and the Gromis Substation located near Kleinsee, Northern Cape Province. A draft Basic Assessment Report (dBAR) has been completed in terms of the National Environmental Management Act, No 107 of 1998 (NEMA) and the NEMA Environmental Impact Assessment (EIA) Regulations, 2014.

The three proposed deviations are to avoid three areas:

- Landing Strip in Lutzville which will result in a deviation of approximately 4.1 km;
- Tronox Mine Namakwa Sands which will result in a deviation of approximately 3 km; and
- A new mine in Kamiesberg which will result in a deviation of 7.2 km.

A Heritage Impact Assessment (HIA) was conducted by Vhubo Archaeo-Heritage Consultants CC.

*Magoma, M. 2016. Phase I Archaeological and Cultural Heritage Impact Assessment Specialist Report for the Proposed 400kv Power Line from the existing Eskom Juno Substation to the existing Eskom Gromis Substation in the Western and Northern Cape Provinces respectively.*

No heritage resources were identified as part of the HIA. Recommendations provided in the report include the following:

- The client is reminded to take precautions during construction activities, should any archaic material be unearthed, activities should be halted immediately and SAHRA be consulted during construction;

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- Prior to construction, contractors should be given training on how to identify and protect archaeological remains that may be discovered during the project. The pre-construction training should include some limited site recognition training for the types of archaeological sites that may occur in the construction areas;
- In the event that any of the above are unearthed, construction on the affected pylon site should cease and the area be demarcated by a danger tape. Accordingly, a professional archaeologist or SAHRA officer should be contacted immediately. In the meantime, it is the responsibility of the contractor to protect the site from publicity (i.e., media) until a mutual agreement is reached. Noteworthy that any measures to cover up the suspected archaeological material or to collect any resources is illegal and punishable by law. In the same manner, no person may exhume or collect such remains, whether of recent origin or not, without the endorsement of SAHRA.

## Interim Comment

While no heritage resources were identified as part of the HIA, it is no clear whether the deviations were surveyed or the areas the deviation is to avoid were surveyed.

Extract from submitted HIA: "The Phase 1 Archaeological and Cultural Heritage Impact Assessment for the proposed Juno-Gromis 400kV power line has identified no archaeological or cultural material on the area proposed for the Landing Strip, Tronox Mine and Kamiesberg Mine."

The above suggests that the areas that are to be avoided were surveyed and not the deviations.

It is also noted that the approved powerline deviations are located within areas of very high palaeontological sensitivity. SAHRA Archaeology, Palaeontology and Meteorites (APM) Unit requests that a Desktop Palaeontological Study be completed to ascertain whether a field assessment of the approved line would be necessary for the construction phase of the powerline.

Further comments will be issued upon receipt of the above requested report and clarification of the HIA.

Additionally, please submitted Appendix A (Maps) of the dBAR and map the deviations on the GIS Layer of the SAHRIS Case application.

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

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Yours faithfully

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Natasha Higgitt  
Heritage Officer  
South African Heritage Resources Agency

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John Gribble  
Manager: Maritime and Underwater Cultural Heritage Unit / Acting Manager: Archaeology, Palaeontology and Meteorites Unit  
South African Heritage Resources Agency

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**ADMIN:**

Direct URL to case: <http://www.sahra.org.za/node/375153>  
(DEA, Ref: )