Our Ref:



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Enquiries: Natasha Higgitt Date: Friday October 27, 2017

Tel: 021 462 4502 Page No: 1

Email: nhiggitt@sahra.org.za

CaseID: 11361

Final Comment

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

Attention: AECOM SA - Head Office

P O Box 3173 Pretoria 0001

Aries Power Line

Nsovo Environmental Consulting was appointed by Transnet Freight Rail (TFR) to conduct a Basic Assessment Process for the proposed upgrade of the Eskom Aries Substation and the construction of 5km 50kv powerline from Aries to the proposed new Transnet Traction Feeder, Kai !Garib Local Municipality, Northern Cape Province. A Basic Assessment Report was submitted in support of an Environmental Authorisation Application in terms of the National Environmental Management Act, 1998 (NEMA), NEMA 2010 EIA Regulations. The proposed development was authorised by the Department of Environmental Affairs on 31 March 2015 (Ref: 14/12/16/3/3/1/1243).

It is noted that the Archaeological Impact Assessment (AIA) submitted for the case is referenced in SAHRIS Case ID 6857, the original application as part of the BAR process (http://sahra.org.za/sahris/cases/proposed-construction-transnet-aries-tfs-and-5km-50kv-power-line). No comments were issued by SAHRA on this case.

The AIA conducted as part of the BAR was completed by Vhubo Archaeo-Heritage Consultants.

Magoma, M. 2014. Phase 1 Archaeological Impact Assessment Report for the Proposed Construction of Transnet 5 KM 50kv Power Line from Eskom Aries Substation to the Proposed New Transnet Aries Traction Feeder Substation within the jurisdiction of Kai! Garib Local Municipality ZF Mgcawu District, Northern Cape Province.

Middle Stone Age artefacts occurrences of medium to high significance were identified within the powerline route.

Recommendations provided include that the area proposed for a powerline is subjected to a heritage walk-down study once all the final pylon placements have been made. The walk down will focus on the



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individual pylon positions to see if any pylons will negatively impact on any archaeological sites. It should also concentrate on servitude and access roads that will be used during the construction.

An Archaeological Walk-down Survey was conducted in fulfillment of the Environmental Management Programme (EMPr).

Van der Walt, J. 2017. Archaeological Walk-down Survey for the Proposed Aries 50kv Power Line near Kenhardt, Kai! Garib Local Municipality of ZF MgCawu District, Northern Cape.

Numerous stone artefacts were identified along the power line route. A single lower grinding stone with several flakes/blades were identified between tower 9 and 10 (Site name: Aries 1). A chance finds procedure was recommended.

The 2015 Construction EMPr has the following mitigation measures with regards to heritage resources:

- Tower 13: Phase 2 archaeological mitigation of the site is recommended. In addition, a destruction permit must be sought to destroy the site;
- Tower 14: Archaeological monitoring during the first construction stage is recommended. Should significant material be exposed, further mitigation work may be required;
- Tower 18: Phase 2 archaeological mitigation of the site is recommended. In addition, a destruction permit must be sought to destroy the site;
- Tower 19: An archaeological monitoring must be undertaken during construction of Tower 19, to ensure that no negative impact result on the noted sites. In addition, Eskom must take note of the site and its position and ensure that no negative impact take place during construction;
- Tower 20: An archaeological monitoring must be undertaken during construction of Tower 20, to
 ensure that no negative impact result on the noted sites. In addition, Eskom must take note of the site
 and its position and ensure that no negative impact take place during construction;
- Tower 25: Monitoring during construction of tower no. 25 to determine if whether the density of these isolated tools are consistently low, or not.

In an Interim Comment issued on 17/08/2017, SAHRA requested clarity on the heritage resources at the towers as noted above in the CEMPr. There is no correlation between the heritage reports written and the recommended mitigation measures at towers 13, 14, 18, 19, 20 and 25. Please provide descriptions of the heritage resources including statement of significance, photographs and impact assessments. Additionally, a desktop Palaeontological Impact Assessment must be conducted for the project as the development is located within an area of moderate sensitivity.



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Rossouw, L. 2017. Palaeontological Desktop Assessment of the proposed new 5 km-long section of the Aries power line near Kenhardt, Northern Cape Province.

The authorised development footprint is underlain by glacially related Dwyka Group sediments of low to moderate palaeontological sensitivity. These sediments are capped by superficial deposits of moderate to high palaeontological sensitivity. As such landscape features such as water course, depression margins and pan dune deposits are palaeontological sensitive.

Recommendations provided in the report include that it is advised that a Phase 1 Palaeontological Impact Assessment must be conducted for structure location 12TRA 7 to 12TRA 9, 12TRA 13, 12TRA 20 and 12TRA 24 before the start of any excavation so that potential palaeontological remains can be identified, recorded and removed.

Van der Walt, 2017. Letter ref: SAHRIS Case ID 11361. Aries Heritage Walk through.

The letter provided by the consultant noted that the recommendations for mitigation for towers referred to above, were the result of findings of the Magoma 2014 report which stated "Several archaeological sites with high significance, and dating to the Stone Age were noted along the area proposed by the powerline". These resources are photographed in figure 6 and 7 in the Magoma report.

It is of the opinion of Mr. Van der Walt that some the artefacts photographed in figure 7 are not artefacts, and that the significance attributed to these findings should be low. Additionally, the consultant has recommended that the recommended mitigation measures provided at towers 13, 14, 18, 19, 20 and 25 be excluded from the CEMPr as a systematic collection of material on the boarder of Olyven Kolk Farm was conducted in 1995 and a lithic analysis of material from Klein Zwart Bast was conducted in 2012.

In an Interim Comment issued on 06/10/2017, SAHRA requested that a Palaeontological Impact Assessment inclusive of a field survey must be conducted by a qualified palaeontologist for towers 12TRA 7 to 12TRA 9, 12TRA 13, 12TRA 20 and 12TRA 24 prior to construction. The PIA must be submitted to SAHRA for comment prior to construction. No construction may commence without comment from SAHRA.

Rossouw, L. 2017. Phase 1 Palaeontological Impact Assessment for structure locations marked 12TRA 7 to 12TRA 9, 12TRA 13, 12TRA 20 and 12TRA 24along the proposed new 5 km-long section of the Aries power line near Kenhardt, Northern Cape Province.

The powerline pylon locations 12TRA 7 to 12TRA 9, 12TRA 13, 12TRA 20 and 12TRA 24 are located on

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superficial deposits that are not palaeontological significant. A pedestrian survey of the proposed locations of the pylons was conducted and no palaeontological resources were identified.

Final Comment

The SAHRA Archaeological, Palaeontological and Meteorites (APM) Unit has no objections to the development and supports the recommendations of the specialists as referred to above (Van der Walt, 2017. Walk down; Rossouw, 2017. PIA Desktop; Van der Walt, 2017 Letter; and Rossouw, 2017. PIA field survey). The recommendations of the specialists and the following conditions apply to the development and must be included in the CEMPr:

• If any evidence of archaeological sites or remains (e.g. remnants of stone-made structures, indigenous ceramics, bones, stone artefacts, ostrich eggshell fragments, charcoal and ash concentrations), fossils or other categories of heritage resources are found during the proposed development, SAHRA APM Unit (Natasha Higgitt/Phillip Hine 021 462 5402) must be alerted. If unmarked human burials are uncovered, the SAHRA Burial Grounds and Graves (BGG) Unit (Thingahangwi Tshivhase/Mimi Seetelo 012 320 8490), must be alerted immediately. A professional archaeologist or palaeontologist, depending on the nature of the finds, must be contracted as soon as possible to inspect the findings. If the newly discovered heritage resources prove to be of archaeological or palaeontological significance, a Phase 2 rescue operation may be required subject to permits issued by SAHRA.

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

Yours faithfully

Natasha Higgitt Heritage Officer

South African Heritage Resources Agency

Aries Power Line

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Phillip Hine

Acting Manager: Archaeology, Palaeontology and Meteorites Unit

South African Heritage Resources Agency

ADMIN:

Direct URL to case: http://www.sahra.org.za/node/405808

Terms & Conditions:

- 1. This approval does not exonerate the applicant from obtaining local authority approval or any other necessary approval for proposed work.
- 2. If any heritage resources, including graves or human remains, are encountered they must be reported to SAHRA immediately.
- 3. SAHRA reserves the right to request additional information as required.