



Letter

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

Attention: Mrs Gabriele Wood
Savannah Environmental (Pty) Ltd
P.O. Box 148
Sunninghill
2157

Proposed TSE Distribution Substation near Nourpoort, Northern Cape Province. DEA Ref No: 14/12/16/3/3/1/732

On 8 February 2013, Savannah Environmental Consultants submitted a Heritage Report and a Palaeontological Report for the above proposed development to SAHRA for assessment. SAHRA responded on 11 February 2013 indicating that while the Heritage Report was satisfactory, more was required in terms of an assessment of palaeontological heritage. Please see attached letter titled "Interim Comment". On 14 February, SAHRA received a letter from Savannah quoting a palaeontologist as saying that the shallow excavations for the development (of all five SEFs and the substation) would not affect the palaeontology, despite the palaeontological assessments submitted for all six proposals requesting a site visit. The source of this quote was not provided. This concern was brought to the attention of Savannah in an email dated 18 March 2013. Savannah stated in this letter that SAHRA's request would nonetheless be submitted to DEA.

On 11 June 2013, Savannah Environmental Consultants submitted the Final BAR to SAHRA as part of the required NEMA I&AP process. No Draft BAR was ever uploaded to SAHRIS. Upon reading the submitted Final BAR, it came to SAHRA's attention that the additional information requested in the Interim Comment from SAHRA dated 11 February 2013 has not yet been submitted.

Upon further investigation of the submitted Final BAR, SAHRA noted that an edited version of its comments of 11 February 2013 had been included (see page 59 of the Final BAR). This edited version of SAHRAs comments is misrepresentation of SAHRA's comments, and no indication is given that DEA was informed of SAHRA's request for a Palaeontological site visit as stated in Savannah's letter of 14 February.

In terms of Section 38(8) of the National Heritage Resources Act (Act 25 of 1999), any assessment done on heritage resources including palaeontology, must satisfy the requirements of the relevant heritage authority. In this instance, the relevant heritage authority is SAHRA.

The heritage report for palaeontological heritage included in the submitted Final BAR does not satisfy our requirements.

We therefore request that, before any decision may be taken regarding this case, SAHRA is provided with the Field Assessment PIA and the comments deriving from the report be considered with the Final BAR for final decision by DEA.





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

Yours faithfully

Kathryn Smuts
Heritage Officer: Archaeology
South African Heritage Resources Agency

Colette Scheermeyer
SAHRA Head Archaeologist
South African Heritage Resources Agency

ADMIN:

Direct URL to case: <http://www.sahra.org.za/node/110084>
(DEA, Ref: 14/12/16/3/3/1/732)

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.

