

Our Ref:



an agency of the  
Department of Arts and Culture

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CaseID: 16108

Date: Wednesday March 24, 2021  
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## Interim Comment

**In terms of Section 38(3), 38(8) of the National Heritage Resources Act (Act 25 of 1999)**

Attention: Warren Morse  
Mulilo Total Hydra Storage (Pty) Ltd

**Environmental Authorisation (EA) for the relevant PV Solar Energy facility with associated infrastructure had already been issued. It is proposed to amend the project descriptions by adding a 9.9MW Auxiliary Generator to the approved PV plant. The generator area will each affect 50m x 50m (0.25ha). The plant would be located adjacent to the central substation and within the authorised footprint area of the PV site.**

Landscape Dynamics Environmental Consultants has been appointed by Mulilo Total Hydra Storage (Pty) Ltd to conduct an Environmental Authorisation (EA) Amendment Application process for the authorised Mulilo De Aar PV Plant near De Aar, Northern Cape Province (DEFF Ref Nr: 12/12/20/2499).

A Draft Motivation Report has been submitted in terms of the National Environmental Management Act, no 107 of 1998 (NEMA) and the NEMA Environmental Impact Assessment (EIA) Regulations. The proposed amendment will include installation of an Auxiliary Generator Set within the footprint of the authorised PV plant with a footprint of 2 500 m<sup>2</sup>.

ACO Associates CC were appointed to provide heritage specialist input as part of the EA Amendment application report as required by section 24(4)b(iii) of NEMA and section 38(3) and 38(8) of the National Heritage Resources Act, Act 25 of 1999 (NHRA).

*Gribble, J. 2020. Badenhorst Dam Solar PV 2 and PV 3 Facilities Environmental Authorisation Amendment: Specialist Impact Statement.*

It is noted that the submitted heritage statement pertains to the construction of battery energy storage systems, and not the current amendment application activities i.e. SAHRIS Case ID 15493 (<https://sahris.sahra.org.za/cases/bess-ea-amendment-application-badenh-pv3>).

### Interim Comment

The SAHRA Archaeology, Palaeontology and Meteorites (APM) Unit requests that application specific letter

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regarding the impact to heritage resources be provided as part of the EA Amendment Application. This letter can be similar to the letter submitted on the case, but it must be application specific.

The proposed development footprint is located within an area of high palaeontological sensitivity as per the SAHRIS PalaeoSensitivity Map. Therefore, a desktop Palaeontological Impact Assessment must be compiled by a qualified palaeontologist and the report must comply with the 2012 Minimum Standards: Palaeontological Components of Heritage Impact Assessments.

The mentioned Minimum Standards make allowance for Letter of Request for Exemption for Further Studies that may be submitted should the palaeontological specialist deem it necessary, similar to the letter submitted currently, however, it must be application specific.

The applicant is advised to extend the EA Amendment process in terms of section 32(1)b of the NEMA EIA regulations in order to comply with this comment.

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

Yours faithfully

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Natasha Higgitt  
Heritage Officer  
South African Heritage Resources Agency

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Phillip Hine

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Manager: Archaeology, Palaeontology and Meteorites Unit  
South African Heritage Resources Agency

**ADMIN:**

Direct URL to case: <https://sahris.sahra.org.za/node/558141>  
(DEA, Ref: 12/12/20/2499)