

Our Ref:



an agency of the
Department of Arts and Culture

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South African Heritage Resources Agency | 111 Harrington Street | Cape Town
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CaseID: 16541

Date: Friday June 25, 2021
Page No: 1

Final Comment

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

Attention: SiVEST SA (Pty) Ltd

PROPOSED CONSTRUCTION AND OPERATION OF THE BATTERY ENERGY STORAGE SYSTEM (BESS) AND ASSOCIATED INFRASTRUCTURE FOR THE AUTHORISED DWARSRUG WIND ENERGY FACILITY, LOCATED NEAR LOERIESFONTEIN IN THE HANTAM LOCAL MUNICIPALITY, NAMAKWA DISTRICT IN THE NORTHERN CAPE PROVINCE OF SOUTH AFRICA.

Sivest Environmental has been appointed by Dwarsrug Wind Farm (Pty) Ltd to conduct an Environmental Authorisation (EA) Application for the construction of a BESS and associated infrastructure within the authorised Dwarsrug Wind Energy Facility (WEF), near Loeriesfontein, Northern Cape Province (Ref no: 14/12/16/3/3/1/2262).

A Final Basic Assessment Report (FBAR) has been submitted in terms of the National Environmental Management Act, 1998 (NEMA) and the 2017 NEMA EIA Regulations. The proposed development includes a new battery energy storage system (BESS) within the authorised layout. It must be noted that SAHRA was not provided the opportunity to provide comments during the Public review phase of the project and the EA has been granted for the proposed BESS development on the 05/05/2021.

It is noted that SAHRA provided a comment on the original EA application for the Dwarsrug WEF in 2015 on SAHRIS Case ID 6161. SAHRA noted no objections to the development and provided conditions to be implemented (<https://sahris.sahra.org.za/node/320988>). Additionally, SAHRA provided comments on an EA Amendment application for the WEF in SAHRIS Case ID 14397, and SAHRA noted no objections to the development and provided conditions to be implemented (<https://sahris.sahra.org.za/node/532953>).

Banzai Environmental (Pty) Ltd and PGS Heritage (Pty) Ltd were appointed to provide heritage specialist input as part of the EA process as required by section 24(4)b(iii) of NEMA, and in terms of section 38(3) of the National Heritage Resources Act, Act 25 of 1999 (NHRA) as required by section 38(8) of the NHRA.

Butler, E. 2020. Palaeontological Desktop Report: Proposed Construction and Operation of the Battery Energy Storage System (BESS) and Associated Infrastructure for the Authorised Dwarsrug Wind Energy Facility.

Battery Energy Storage System for Dwarsrug Wind Energy Facility located near Kimberly

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The proposed development area is underlain by Karoo dolerite and Dolerite rubble which do not contain fossils, and the Tierberg Formation of moderate sensitivity and the Whitehill Formation of high sensitivity. Trace fossils and fossil plant remains are known to be located in the Tierberg Formation, while palaeoniscoid fish, mesosaurid reptiles, eocarid crustaceans, insects, spores and pollens are known to be located within the Whitehill Formation. The impact of the proposed development will be low and a Chance Finds Protocol is recommended to be implemented which is provided in the report.

Fourie, W. 2020. Heritage Impact Assessment: Proposed Construction and Operation of the Battery Energy Storage System (BESS) and Associated Infrastructure for the Authorised Dwarsrug Wind Energy Facility.

No heritage resources were identified within the proposed development area.

Recommendations provided in the report include the following:

- An assessment of the final footprint of the BESS must be conducted with the final walkdown of the WEF infrastructure layout during the implementation of the EMPr;
- In the event that heritage resources are discovered during site clearance, construction activities must stop in the vicinity, and a qualified archaeologist must be appointed to evaluate and make recommendations on mitigation measures.

Final Comment

It must be noted that the EA application process has been concluded without including SAHRA during the review period. However, as no heritage resources of high significance were identified during the heritage assessments and SAHRA is satisfied with the submitted heritage reports, SAHRA will not follow appeal procedures for the granting of the EA without fully complying with section 38(8) of the NHRA i.e. including the comments of the relevant heritage resources authority during the decision making phase.

SAHRA notes Conditions 35 and 38 of the granted EA and requests the applicant to make note of the following:

- The comments issued on SAHRIS Case ID 6161 and 14397 remain valid and must be adhered to in reference to the proposed development;
- If any evidence of archaeological sites or remains (e.g. remnants of stone-made structures, indigenous

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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 as per section 35(3) of the NHRA. Non-compliance with section of the NHRA is an offence in terms of section 51(1)e of the NHRA and item 5 of the Schedule;

- 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 as per section 36(6) of the NHRA. Non-compliance with section of the NHRA is an offence in terms of section 51(1)e of the NHRA and item 5 of the Schedule;
- See section 51(1) of the NHRA for a list of offences;
- The following conditions apply with regards to the appointment of specialists:
- If heritage resources are uncovered during the course of the development, a professional archaeologist or palaeontologist, depending on the nature of the finds, must be contracted as soon as possible to inspect the heritage resource. 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

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

ADMIN:
Direct URL to case: <https://sahris.sahra.org.za/node/574716>
(DEA, Ref: 14/12/16/3/3/1/2262)