



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: 16690

Date: Wednesday February 09, 2022

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Final Comment

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

Attention: Willem den Heijer
Samancor Chrome Limited

Samancor Chrome Ltd (Samancor) is proposing the development of a 100MWp Photovoltaic (PV) Plant across 5 sites associated with the Tubatse Ferrochrome (TFC) Smelter, on the farm Goudmyn 337 KT Portions: 0, 1, 6, 7, 10, Fetakgomo Tubatse Local Municipality, Limpopo Province.

Royal Haskoning DHV (Pty) Ltd has been appointed by Samancor (Pty) Ltd to undertake an environmental assessment as part of the Scoping and Environmental Impact Reporting process in support of an Environmental Authorisation (EA) in terms of the National Environment Management Act, Act 107 of 1998 (NEMA) for activities that trigger the NEMA EIA 2014 Regulations.

The solar plant will be spread of 3 sites, and construction will include cabling between the structures, to be laid underground where practical, new 33 kV overhead power lines between the various sites and the Tubatse East and West substation buildings, Local substation and transformer yard at each PV site, Containerized switchgear substation at Tubatse East and west MV substations for connecting to the Tubatse substation busbars, Water provision infrastructure (i.e. pipeline/ s, storage tank/ s, etc.) for PV panel cleaning, Battery Energy Storage System (BESS), Internal access roads (4- 6 m wide roads will be constructed but existing roads will be used as far as possible) and fencing (approximately 3 m in height), gates and access control.

A Scoping Report and Heritage Impact Assessment (HIA) Report was submitted to the South African Heritage Resources Agency (SAHRA) for commenting in terms of section 38(8) of the National Heritage Resources Act, Act 25 of 1999 (NHRA). The Scoping report states that a Heritage Impact Assessment (HIA) and PIA has been commissioned as part of the EA applications specialist studies.

Fourie, W. May 2021. Proposed 60MW PV Plant at the Samancor Chrome's Tubatse Ferrochrome Smelter, Steelpoort, Limpopo.

The author undertook a field assessment of the proposed 60MW solar plant and identified 24 separate heritage sites consisting of burial grounds and grave, Later Iron Aged settlements, and recent historic structures. There are 5 burial grounds (Sites 1-1, 1-7, 2-1, 2-2 and 2-3 which is listed as a possible grave) that are all of local high significance. There are 9 archaeological sites (Site 3-1, 3-2, Site 4-1, 4-2, and Sites 5-1,



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5-2, 5-3, 5-4 and 5-6), they are of medium significance. There are 9 historic structures (Sites 1-2, 1-3, 1-4, 1-5, 1-6, 2-4, 2-5, 5-5 and 5-7) and they vary in significance from medium to low. Site 5-8 is a locally significant memorial that is in disuse, it is rated as being of low significance.

Project alternatives 2, 3 and 5 will have the least impact on the archaeological sites.

The author recommends the following:

The mitigation work will be required for sites 3 (3-1, 3-2,) and 5 (5-1, 5-2, 5-3, 5-4 and 5-6) as all assessed alternatives will impact the sites.

Extensive mitigation work is required for site 4 (Site 4-1, 4-2).

A permit issued under s35 of the NHRA will be required to conduct such work. On completion of the mitigation work the developer can apply for a destruction permit with the backing of the mitigation report.

The burial ground and graves should be conserved *in situ* with a buffer zone of 30m.

The area is located in a region of low palaeontological significance in terms of the palaeosensitivity map on SAHRIS, and according to the SAHRIS palaeomap a fossil finds procedure must be developed and included in the EMPr.

SAHRA issued an Interim Comment dated 23/07/2021 noting the submission of the HIA, Scoping Report and its appendices. SAHRA stated that it will comment further on the application upon the submission of the draft EIA report and its appendices. The draft EIAr and it's appendices were submitted 03/11/2021.

Final Comment

The SAHRA Archaeology, Palaeontology and Meteorites (APM) accepts the HIA report and the recommendations provided in both reports. The SAHRA has no objection to the development going ahead on the following conditions:

A suitably qualified archaeologist must be appointed by the developer in order to mitigate and implement the recommendations provided in Heritage Impact Assessment. The appointed archaeologist must obtain a section 35(4) permit in terms of NHRA and Chapter IV NHRA Regulations, before any excavations or mitigation work of the archaeological sites.

A Chance Finds Fossil Procedures must be developed by a palaeontologist and it must be included in the EMPr.

Environmental Authorisation for the 100MWp Photovoltaic Plant associated with the Tubatse Ferrochrome Smelter, Steelpoort, Fetakgomo Tubatse Local Municipality

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If fossil remains or trace fossils are discovered during any phase of construction, either on the surface or exposed by excavations the Environmental Officer (EO) in charge of these developments must be informed. These discoveries ought to be protected and the ECO must report to SAHRA.

In the event that fossils are uncovered during construction then construction must cease within the immediate vicinity, a buffer of 30 m must be established, and a palaeontologist called in to inspect the finds. The palaeontologist must obtain a section 35(4) permit in terms of NHRA and Chapter IV NHRA Regulations, before any fossils are collected.

If there are any new heritages resources are discovered during construction and operation phases of the proposed development, then a professional archaeologist or palaeontologist, depending on the nature of the finds, must be contracted as soon as possible to inspect the findings at the expense of the developer.

If the newly discovered heritage resources prove to be of archaeological or palaeontological significance, a Phase 2 rescue operation may be required at the expense of the developer. Mitigation will only be carried out after the archaeologist or palaeontologist obtains a permit in terms of section 35 of the NHRA (Act 25 of 1999). You may contact SAHRA APM Unit for further details: (Nokukhanya Khumalo/Phillip Hine 021 202 8654).

The Burial Grounds and Graves (BGG) Unit accepts the recommendations provided in the HIA report. A social consultation process in terms of Chapter XI of the NHRA Regulations, must be carried out to identify the descendants of the burials and to obtain permission to fence in the burial identified. If the mine is unable to retain the grave in situ the permission must be obtained from the families of the deceased, if they agree to the relocation of their graves then a section 36 of the NHRA permit application must be logged on SAHRIS.

If any unmarked human burials are uncovered and the archaeologist called in to inspect the finds and/or the police find them to be heritage graves, then mitigation may be necessary and the SAHRA Burial Grounds and Graves (BGG) Unit must be contacted for processes to follow (Thingahangwi Tshivhase/Ngqalabutho Madida 012 320 8490).

The Final EIA and its appendices must be submitted to the case and once a Record of Decision from the competent authority is issued, it must also be submitted to the case.

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

**Environmental Authorisation for the 100MWp Photovoltaic Plant associated
with the Tubatse Ferrochrome Smelter, Steelpoort, Fetakgomo Tubatse Local
Municipality**

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Yours faithfully

Nokukhanya Khumalo
Heritage Officer
South African Heritage Resources Agency

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

ADMIN:

Direct URL to case: <https://sahris.sahra.org.za/node/576604>
(DEA, Ref: DFFE Ref: 14/12/16/3/3/2/2079)

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.