

**ENVIRONMENTAL MANAGEMENT PROGRAMME REPORT AND FINAL LAYOUT
FOR THE AUTHORISED 140MW RIETRUG WIND ENERGY FACILITY,
ASSOCIATED INFRASTRUCTURE, NORTHERN CAPE**

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: 17108

Date: Friday January 27, 2023
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Final Comment

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

Attention: South Africa Mainstream Renewable Power Developments (Pty) Ltd

P.O. Box 45063
Claremont
7753

FINAL ENVIRONMENTAL MANAGEMENT PROGRAMME REPORT AND FINAL LAYOUT FOR THE AUTHORISED 140MW RIETRUG WIND ENERGY FACILITY, ASSOCIATED INFRASTRUCTURE AND GRID CONNECTION INFRASTRUCTURE NORTHERN & WESTERN CAPE PROVINCES

Nala Environmental Consulting has been appointed by Sutherland Wind Farm (Pty) Ltd to submit the Final Environmental Management Programme (EMPr) for the authorised Rietrug WEF and associated infrastructure, near Sutherland, Northern Cape Province (12/12/20/1782/1/AM5).

The Final EMPr has been submitted in terms of the National Environmental Management Act, 1998 (NEMA) and the 2017 NEMA Environmental Impact Assessment (EIA) Regulations.

Previous SAHRIS Applications relevant to this case include: Case ID 9622

(
<https://sahris.sahra.org.za/cases/amendment-application-proposed-splitting-sutherland-renewable-energy-facility-three-140-mw>), Case ID 10499

(
<https://sahris.sahra.org.za/cases/ea-amendment-process-rietrug-wind-energy-facility-wef-northern-cape-province-rietrug-wef-%E2%80%93>) and Case ID 14518

(
<https://sahris.sahra.org.za/cases/amendment-no-3-environmental-authorisation-rietrug-wef-near-sutherland-nc>
).

Natura Viva CC and ASHA Consulting (Pty) Ltd was appointed to provide heritage specialist input as required by section 24(4)b(iii) of NEMA and section 38(8) of the National Heritage Resources Act, Act 25 of 1999 (NHRA).



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Almond, J. E. 2022. Palaeontological Heritage Report: Combined Desktop & Field-Based Study 1 Authorised 140MW Rietrug (DFFE Ref: 12/12/20/1782/1/AM5) and 140MW Sutherland (DFFE Ref: 12/12/20/1782/2/AM6) Wind Energy Facilities (WEFS) and their Associated Grid Connections (DFFE Ref: 14/12/16/3/3/1/2457/AM1, 14/12/16/3/3/1/2458 & 14/12/16/3/3/1/2077/AM2) Between Sutherland & Merweville, Karoo Hoogland Municipality (Namaqua District), Northern Cape and Laingsburg Municipality (Central Karoo District), Western Cape Provinces.

Several new fossil sites were identified as part of the walkdown. These include trace fossils such as root casts and burrows, flaked reworked bone, ex-situ partial large pareiasaurian skeleton, isolated tooth of pareiasaur, ex-situ coprolite, ex-situ dicynodont skull, petrified wood.

None of the new fossil sites lies directly within or close to (< 20 m) the WEF and grid connection project footprints while scientifically valuable sites have already been sampled for curation in the palaeontological collections of the Evolutionary Studies Institute (ESI), Wits University Johannesburg (Fossil Collection Permit of Professor Bruce Rubidge). No mitigation measures - including micro-siting of the proposed final layouts - are therefore proposed in their regard.

Recommendations provided in the report include the following:

- The final, approved layouts of the WEF and its associated Grid Connection Infrastructure must be cross-checked by a professional palaeontologist against the available palaeontological database prior to commencement of site clearing and excavation activities. Residual, potentially sensitive, unsurveyed sectors of the project footprint must be surveyed and mitigated in the Pre-construction Phase (prior to any site clearance and bedrock excavations) by a professional palaeontologist, with recording and judicious sampling or collection of scientifically valuable fossil material.
- A Chance Fossil Finds Procedure is recommended to be implemented and is provided in the report.

Orton, J. 2022. Pre-Construction Archaeological Survey of the Authorised 140MW Rietrug Wind Energy Facility and Associated Grid Connection Infrastructure, Northern & Western Cape Provinces

A total of 26 new previously unidentified heritage sites were identified within the development footprint. These include scatters of historical artefacts, a dam walls with stone lining, stone walling and stone cairns of very low heritage significance, stone structures of low heritage significance, stone walled enclosure and Stone Age kraal complex of medium heritage significance.

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Recommendations provided in the report include the following:

- The sites identified for avoidance must be avoided (Sites 588, 591, 597, 598, 599, 600, 601, 775, 776, 785, 787, 790, 791 – 796, 799 – 805, 1167, KO31, H044, H042, H043, H052, HO5b, K042, K047, K048, K051, H058b, 581, 582, 583, 561, 560, 557 – 559, 578, 579);
- Flagging of no-go areas is required for sites less than 30 m from the project footprint (Northern Cape and Western Cape). This must be done before construction and the sites must be monitored for compliance during construction by the ECO (at least weekly while construction is busy in the relevant areas);
- Unsurveyed sections of the approved final layout must be checked in the field prior to commencement of construction in case of further small sites requiring recording or mitigation (Northern Cape and Western Cape);
- If road widening occurs at waypoint 560 (Northern Cape) then no material may be disposed of down the slope;
- No stones may be removed from any heritage sites (Northern Cape and Western Cape);
- All construction work must occur within the demarcated project footprints and vehicles may not move outside of these areas (Northern Cape and Western Cape);
- A Permit application must be lodged with SAHRA for any mitigation required in Northern Cape (currently none is needed); and
- The developer is reminded that if any archaeological material or human burials are uncovered during the course of development then work in the immediate area should be halted. The find would need to be reported to the heritage authorities (SAHRA or HWC as appropriate) and may require inspection by an archaeologist. Such heritage is the property of the state and may require excavation and curation in an approved institution.

The Final EMPr includes mitigation and management measures located in section 7 (page 41-49), page 82, section 34 (page 110-117), 163, and 177.

Final Comment

**The comments below pertain only to the Northern Cape section of the development.*

The following comments are made as a requirement in terms of section 3(4) of the NEMA Regulations and section 38(8) of the NHRA in the format provided in section 38(4) of the NHRA and must be included in the Final EMPr:

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- The SAHRA Archaeology, Palaeontology and Meteorites (APM) Unit has no objections to the Final EMPr;
- The recommendations of the specialists and the management measures within the EMPr are supported and must be adhered to. No further additional specific conditions are provided for the development;
- The Final EMPr must be submitted to SAHRA for record purposes.

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

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

ADMIN:

Direct URL to case: <https://sahris.sahra.org.za/node/582524>
(DEA, Ref: 12/12/20/1782/1)