

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: 20205

Date: Friday July 21, 2023
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Final Comment

In terms of Section 38(4), 38(8) of the National Heritage Resources Act (Act 25 of 1999)

Attention: Enertrag South Africa (Pty) Ltd

The Proponent, ENERTRAG SA (Pty) Ltd, proposes to develop the Hendrina Green Hydrogen and Ammonia Facility located near Hendrina in the Mpumalanga Province. The project is located within the Steve Tshwete Local Municipality in the Mpumalanga Province.

WSP Group Africa (Pty) Ltd has been appointed by Enertrag SA to conduct an Environmental Authorisation (EA) Application for the proposed Green Hydrogen and Ammonia Facility, near Hendrina, Mpumalanga Province.

A draft Scoping Report (DSR) has been submitted in terms of the National Environmental Management Act, 1998 (NEMA) and the 2017 NEMA Environmental Impact Assessment (EIA) Regulations. The proposed development will include a powerline (3 route options have been considered), a processing facility (3 location options have been considered), water reservoir, water pipeline (3 route options have been considered).

Beyond Heritage was appointed to provide heritage specialist input into the EA process 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).

Van der Walt, J. 2022. Heritage Impact Assessment for the Proposed Hendrina Green Hydrogen and Ammonia Facility, Mpumalanga Province

The HIA assessed only a limited portion of the proposed development components as shown in Figure 1.2 and 1.3 when compared to the layout shown in the DSR in Figure 2-2. A total of three heritage resources were identified that include a stone packed wall (Site 082) and a complex of ruins (features 067 – 071) of low heritage significance, however there is a chance for associated burial sites and therefore will be of high heritage significance, and a cemetery (Site 088) of high heritage significance.

Recommendations provided in the report include the following:

- Implementation of a chance find procedure for the project (as outlined in Section 10.2);
- Avoidance of burial sites (Waypoint 088) with a 50 m buffer and access for family members;



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- Identified ruins (Waypoint 067 – 071 and 082) should be indicated on development plans and avoided during construction;
- Based on the potential risks associated with Option 1 and Option 3 it is recommended that these options are avoided due to the presence of a burial site (Waypoint 088) and ruins (Waypoint 067 to 071);
- Pre-construction heritage walkdown of final layout.

In an Interim Comment issued on the 13/01/2023, SAHRA requested that an updated HIA be submitted that assesses all the development components as shown in Figure 2-2 of the DSR and section 2.3 of the DSR. Additionally, the conducted palaeontological assessment must be submitted for review and comment, where the correct development footprint must be assessed as part of the PIA. Clarity was requested regarding the discrepancy of different applicant and EAP names in the HIA versus the submitted DSR.

Since the issuing of the comment, a revised HIA has been submitted.

Van der Walt, J. 2023. Heritage Impact Assessment for the Proposed Hendrina Green Hydrogen and Ammonia Facility, Mpumalanga

A total of 12 heritage resources were identified. These include ruined structures of low heritage significance and graves of high heritage significance.

Recommendations provided in the report include the following:

- Graves at 093, 094, HD001, HD002, HD 004, HD101 and GA004 must be preserved in situ with a 30-meter buffer as mitigation measure (prescribed by SAHRA), which means that the linear infrastructure will have to be micro sited in the areas where HD002 and GA004 were recorded;
- Based on the current layout, the ruins at GA002 are located in the H2 Option 3 footprint and the cluster of sites at 089 – 092 is located close to the Option 2 powerline. Although of low significance the possible presence of graves at the ruins is a risk. If avoidance is not possible the presence of graves should be confirmed during social consultation and the area should be monitored during construction;
- Implementation of the ENERTRAG Chance Find Procedure for the project (Appendix A);
- Pre-construction heritage walkdown of any deviations of the current layout.

In an Interim Comment issued on the 09/06/2023, SAHRA reiterated the need for the submission of a PIA.

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Since the issuing of the Interim Comment, a PIA and the Final EIA have been submitted (22/06/2023).

Bamford, M. 2023. Palaeontological Impact Assessment for the proposed Hendrina Green Hydrogen and Ammonia facility, Mpumalanga Province

The proposed development area is underlain by the highly fossiliferous Vryheid Formation, however, no fossils were identified as part of the site visit. A Chance Finds Procedure is recommended to be followed.

Final Comment

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 EIA and EMPr:

- 38(4)a – The SAHRA Development Applications Unit (DAU) has no objections to the proposed development;
- 38(4)b – The recommendations of the specialists are supported and must be adhered to. Further additional specific conditions are provided for the development as follows:
 - Access protocols to the graves must be developed to ensure I&APs have access to the graves;
 - Sites GA002 and 089-092 must be avoided with buffers of 30 m. If this is not possible, the recommended social consultation and monitoring must be conducted. SAHRA must be informed regarding the outcomes of these processes;
- 38(4)c(i) – If any evidence of archaeological sites or remains (e.g. remnants of stone-made structures, indigenous 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 DAU (Natasha Higgitt 021 202 8660/ nhiggitt@sahra.org.za) must be alerted as per section 35(3) of the NHRA. Non-compliance with this section of the NHRA is an offence in terms of section 51(1)e of the NHRA and item 5 of the Schedule;
- 38(4)c(ii) – If unmarked human burials are uncovered, the SAHRA DAU (Natasha Higgitt 021 202 8660/ nhiggitt@sahra.org.za) must be alerted immediately as per section 36(6) of the NHRA. Non-compliance with this section of the NHRA is an offence in terms of section 51(1)e of the NHRA and item 5 of the Schedule;
- 38(4)d – See section 51 of the NHRA regarding offences;
- 38(4)e – 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

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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;

- As the Final EIA has been finalised within the inclusion of comments from SAHRA, this comment must be forwarded directly to the competent authority for their consideration as part of the decision-making process as per section 38(8) of the NHRA. Proof of delivery and receipt thereof must be provided.
- The decision regarding the EA Application must be communicated to SAHRA and uploaded to the SAHRIS Case application.

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
Manager: Development Applications Unit
South African Heritage Resources Agency

ADMIN:

Direct URL to case: <https://sahris.sahra.org.za/node/609586>
(DARDLEA, Ref: 1/3/1/16/1N-347)

Terms & Conditions:

1. This approval does not exonerate the applicant from obtaining local authority approval or any other necessary approval for

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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.