

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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Enquiries: Natasha Higgitt
Tel: 021 202 8660
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CaseID: 20607

Date: Monday August 07, 2023
Page No: 1

Final Comment

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

Attention: Ms Deidre Herbst
Eskom Holdings SOC Ltd
P O Box 1091
JOHANNESBURG
2000

The proposed establishment of a Solar Photovoltaic (PV) Energy Facility, Battery Energy Storage System (BESS) Facilities and associated infrastructure at the Komati Power Station, Mpumalanga Province

WSP Group Africa (Pty) Ltd have been appointed by Eskom Holdings SOC Ltd to conduct an Environmental Authorisation (EA) Application for the proposed construction of a solar photovoltaic and Battery Energy Storage System (BESS) at the Komati Power Station, near Komati, Mpumalanga Province.

A draft Scoping Report (DSR) was submitted in terms of the National Environmental Management Act, Act 107 of 1998 (NEMA) and the NEMA EIA Regulations (As amended). The proposed development will include the construction of PV panels, overhead or underground cabling between components, collector substations, access roads, BESS, perimeter roads, meteorological station, operation and maintenance building, warehouse and workshop, hazardous chemical store, security building, parking areas and roads, temporary laydown areas, temporary concrete batching plant, construction camp and onsite substations within an application area of 200 – 250 ha.

Dr Heidi Fourie and APelser Archaeological Consulting have been appointed to provide heritage specialist input as part of the EA process in terms of section 24(4)b(iii) of NEMA and section 38(8) of the National Heritage Resources Act, Act 25 of 1999 (NHRA).

Fourie, H. 2022. Eskom Komati Power Station Solar PV and BESS ESIA: Palaeontological Impact Assessment: Phase 1 Field Study

The proposed development area is underlain by the Vryheid Formation that may contain plant fossils, aquatic



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Page No: 2

reptiles, fossil fish and insects. A field assessment will be undertaken.

Pelser, A. 2022. A desktop Heritage Impact Assessment Report for the Eskom Komati Power Station Solar PV ESIA

The proposed PV facility will be located in areas that have been heavily disturbed and therefore the likelihood of in-situ heritage resources is low. It is recommended that a site visit be undertaken.

In an Interim Comment issued on the 10/03/2023, SAHRA noted the pending heritage reports and stated that the HIA must consider the historical structures associated with the Komati Power Station and any historical structures in the surrounding residential areas that may be impacted by the proposed development. Since issuing the Interim Comment, an HIA and PIA have been submitted, along with the DEIA (05/07/2023).

Fourie, H. 2023. Palaeontological Impact Assessment: Phase 1 Field Study. Komati Power Station Solar Photovoltaic Facility, Battery Energy Storage Systems and Associated Infrastructure, Mpumalanga Province

No fossils were identified as part of the field assessment. A Chance Finds Procedure is recommended to be implemented.

Pelser, A. 2023. A Phase 1 Heritage Impact Assessment Report for the Eskom Komati Power Station Solar Energy Facility (SEF) Mpumalanga Province

No heritage resources were identified within the proposed development footprint. A Chance Finds Procedure is recommended to be implemented.

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. No further additional specific conditions are provided for the development;

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Page No: 3

CaseID: 20607

- 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 offense 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 offense 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 for offences;
- 38(4)e – The following conditions apply with regards to the appointment of specialists:
 - With reference to the mitigation work noted above, a qualified archaeologist must be appointed to undertake the work in terms of the permit applied for as noted above;
 - 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;
 - The Final EIA and EMPr must be submitted to SAHRA for record purposes;
 - 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

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Page No: 4

South African Heritage Resources Agency

ADMIN:

Direct URL to case: <https://sahris.sahra.org.za/node/612483>
(DFFE, Ref: 14/12/16/3/3/2/2298)

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.