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CaseID: 20787

Date: Thursday August 17, 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: Council for Geoscience

Private Bag X112  
Pretoria

**The Council for Geoscience (CGS) is undertaking a geoscientific research project for the piloting of CCUS in Leandra in Mpumalanga, where it is proposed to inject CO<sub>2</sub> into deep suitable geological formations, approximately 1km below the surface. The Government of SA has received funding from the World Bank's International Bank for Reconstruction and Development to finance the CCUS project**

Nemai Consulting has been appointed by the Council of GeoScience to undertake an Environmental Authorisation (EA) Application for Carbon Capture, Utilisation and Storage project, near Leandra, Mpumalanga Province.

A Draft ESIA has been submitted in terms of the National Environmental Management Act, 1998 (NEMA) and the EIA Regulations. The proposed activities will include drilling of a stratigraphic borehole and undertaking a high-resolution 3D seismic survey at the proposed injection site, site camp and parking.

Nitai Consulting have been appointed to provide heritage specialist input into the EA as required by section 24(4)b(iii) of the NEMA and section 38(8) of the National Heritage Resources Act, Act 25 of 1999 (NHRA).

*Kitto, J. 2023. Carbon Capture Utilisation and Storage (CCUS) Project: 3D Seismic Survey and Drilling, Leandra, Mpumalanga Province*

A total of four heritage resources (CCUS 01 – 04) were identified within or immediately adjacent to the proposed reduced development area. These include two possible homesteads of low heritage significance, one stone culvert under the railway line and one grave of high heritage significance.

Recommendations provided in the report include the following:

- The two Historical Railway Culverts at CO-03 and CO-05 are protected by section 34 of the NHRA and must be avoided as a “no-go” area with a 20-30m buffer to prevent any indirect impact and ensure

Our Ref:



an agency of the  
Department of Arts and Culture

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that during site clearance and construction activities these structures are not damaged;

- The demolished structure remains (CCUS 06 to CCUS 07) and possible homestead (CCUS 30) are protected by section 34 of the NHRA. If any negative impact is anticipated on either of these resources, a permit will be required for the destruction/clearance of these resources (from MPHRA or SAHRA);
- The three possible but not certain structure or homestead remains (CCUS 01, CCUS 04 and CCUS 08) are not protected or considered to be conservation worthy and therefore no mitigation is required.
- The potential grave at CO-02, that may be located within or on the boundary of the proposed CO2 Injection site, is protected by section 36 of the NHRA. Therefore, any site clearance activities for the proposed Injection site within 30m of the approximate location, should be monitored by a heritage specialist/archaeologist. If a burial or human remains are uncovered during site clearance or construction activities, a buffer of at least 30m must be placed around the site to ensure that the burial/human remains are not damaged. In addition, all site clearance or construction activities in the immediate vicinity of the burial/human remains must be suspended. The heritage specialist/archaeologist will then need to apply for a permit for a rescue exhumation of the burial/human remains, in compliance with section 36 of the NHRA;
- The informal community church site (CCUS-11) would not be affected as it is situated outside the reduced footprint for the seismic survey.

## Final Comment

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

- 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. Additional further additional specific conditions are provided for the development;
- Reports of the recommended monitoring near the suspected grave site must be submitted to SAHRA upon completion of the construction phase;
- 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 012 202 8660/ [nhiggitt@sahra.org.za](mailto: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;

# Carbon Capture Utilisation and Storage Project: 3D Seismic Survey, Drilling & Injection

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- 38(4)c(ii) – If unmarked human burials are uncovered, the SAHRA DAU (Natasha Higgitt 012 202 8660/ [nhiggitt@sahra.org.za](mailto: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(1) of the NHRA regarding offences;
- 38(4)e – The following conditions apply with regards to the appointment of specialists:
  - i) 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 decision regarding the EA application must be submitted to the SAHRIS application 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

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Natasha Higgitt  
Manager: Development Applications Unit  
South African Heritage Resources Agency

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## ADMIN:

Direct URL to case: <https://sahris.sahra.org.za/node/613675>

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(DFFE, Ref: 14/12/16/3/3/1/2777)

## 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.