

Our Ref:



an agency of the
Department of Arts and Culture

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Date: Monday April 16, 2018
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Letter

In terms of Section 35(4) of the National Heritage Resources Act (Act 25 of 1999)

Attention: Ms Bianca van Zyl
Eskom Distribution Division
06th floor Eskom Tower
04 George Street
Kimberley
8301
Northern Cape

The scope of this project includes electricity distribution lines (6 – 8 distribution lines varying between 50Kv and 132kV) and servitude (100 meter wide) from the existing Ferrum Substation to the new proposed Sekgame Switching Station.

SAHRA has been notified via email of the Amendment of the Environmental Authorisation (EA) issued on the 27 July 2015 for the construction of the 132kV Distribution line from Ferrum Substation to the new Sekgame Switching Station, Gamagara Municipality, Northern Cape Province (Ref no. 14/12/16/3/3/1/1409/AM1).

The Amendment as described in the amended EA issued on the 6 May 2016 is as follows:

- Change the holder of the EA from Sishen Iron Ore Company (Pty) Ltd to Eskom Holdings SOC Limited.

While SAHRA did not issue comments during the Basic Assessment process, the Archaeological Impact Assessment (AIA) conducted for the Basic Assessment Report (BAR) notes the following:

Kruger, 2014. Archaeological Impact Assessment (AIA) of demarcated surface Portions on the Farm Sekgame 461 for the Proposed Sekgame Electricity Infrastructure Expansion Project, Sishen Mine, Northern Cape Province

Recommendations provided in the report include the following:

- A low density Middle Stone Age (MSA) scatter (EXIGO-SG461-SA01) was identified along the proposed electricity distribution line in associated with a shallow quarry. The site is located within the larger Kathu Stone Age Complex. It is therefore recommended that all construction activities be



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monitored by a Stone Age archaeologist familiar with the archaeological sequence of the Kathu Archaeological Complex;

- Larger scatters of MSA material (EXIGO-SG461-SA02 and EXIGO-SG461-SA03) were identified towards the southern offset and eastern sector of the proposed Sekgame switching yard. It is recommended that the infrastructure be realigned to avoid impact on the sites. A buffer of 5 m should be maintained around the identified sites. Should this not be possible, the sites must be subjected to Phase 2 mitigation conducted by a professional archaeologist with experience in Stone Age archaeology of the area. A permit in terms of Section 35 of the National Heritage Resources Act, 1999 (NHRA) will have to be obtained from the responsible authority; and
- A Palaeontological Impact Assessment is recommended for the study area, and should fossil remains such as fossil fish, reptiles or petrified wood be exposed during construction, these objects should be safeguarded and the relevant heritage authority should be notified immediately so that the appropriate action can be taken by a professional palaeontologist.

The Final BAR noted the following regarding heritage resources:

- A Phase 2 HIA will have to be conducted on the MSA site, if the layout cannot be shifted to avoid this site entirely.

In a Letter issued on the 26/05/2016, the following was noted:

No official comments could be issued, however the following conditions should apply to the authorised distribution line:

- The issued EA and conditions should be uploaded to the case file for record keeping;
- If the identified heritage sites are to be impacted by the development, a permit in terms of section 35 of the NHRA must be applied for in order to conduct mitigation measures prior to construction. No impacts may occur to heritage sites without an issued permit. Mitigation can include excavations, surface collection and sub-surface testing. An agreement with a recognized repository must be sought for the long term curation of excavated and collected material. The results of the mitigation must be collated in a Permit Report that must be submitted to SAHRA upon completion;
- As no PIA was conducted as part of the BAR, a Palaeontological Desktop Study should be completed prior to the construction phase and submitted to SAHRA for comments. No construction may commence without comments from SAHRA; and
- 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



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or other categories of heritage resources are found during the proposed development, SAHRA APM Unit (Natasha Higgitt/Phillip Hine 021 462 5402) must be alerted. If unmarked human burials are uncovered, the SAHRA Burial Grounds and Graves (BGG) Unit (Itumeleng Masiteng/Mimi Seetelo 012 320 8490), must be alerted immediately. A professional archaeologist or palaeontologist, depending on the nature of the finds, must be contracted as soon as possible to inspect the findings. If the newly discovered heritage resources prove to be of archaeological or palaeontological significance, a Phase 2 rescue operation may be required.

Since the Letter issued on 26/05/2016, a Walk-down of the final route has been completed by Archaetnos Culture and Cultural Resources Consultants.

Van Vollenhoven, A. 2017. A Report on a Walk Down Archaeological Impact Assessment for the Proposed Construction of 132kv Distribution Lines from Ferrum Substation to the Proposed New Sekgame Switching Station, Gamagara Local Municipality, Northern Cape Province.

No additional heritage resources were identified as part of the walk down. The three sites highlighted in the AIA were visited during the walk-down and were subsequently rated as sites of low significance that did not require mitigation as they contained very little artefacts.

Recommendations provided in the walk down report include the following:

- It is the opinion of the author that none of the four locations where stone tools were found warrant being called sites. The artefacts are too few and of a bad quality and should therefore be called occurrences. All of these are of negligent heritage significance and only two will be impacted on;
- A Chance Finds Procedure should be followed.

In a comment issued on the 25/01/2018, SAHRA accepted the Walk down report and the amended significance and impact assessment to identified heritage resources. As stated previously, SAHRA cannot provide any comments in terms of section 38(4) or section 38(8) as the EA application process has been completed, however, SAHRA urged the applicant to abide by conditions in order to avoid damaging heritage resources as per section 35(4) of the NHRA that include that the conditions provided as part of the Letter issued on 26/05/2016 must still be addressed i.e. a Palaeontological Desktop Study must be completed prior to construction and submitted to SAHRA for comment.

Butler, E. 2018. Palaeontological Desktop Assessment for the Proposed Electricity Expansion Project and Sekgame Switching Station at the Sishen Mine, Northern Cape Province.

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The proposed development footprint is underlain by Kalahari sands of the Gordonia Formation which is known to include fossils such as mammalian teeth, bones and horn corns, reptile skeletons and ostrich eggshell fragments. Microfossils such as non-marine molluscs shells and freshwater stromatolites, and plant remains are also present in this formation. The impact to palaeontological resources will be low.

Recommendations provided in the report include the following:

- In the event that fossil remains are discovered during any phase of construction, either on the surface or unearthed by fresh excavations, the ECO in charge of these developments ought to be alerted immediately. These discoveries should to be protected, preferably in situ, and the ECO must report to SAHRA so that proper mitigation (recording, collection) can be carry out by a professional paleontologist;
- Preceding any collection of fossil material, the specialist would need to apply for a collection permit from SAHRA. Fossil material must be curated in an approved collection (museum or university collection) and all fieldwork and reports should meet the minimum standards for palaeontological impact studies created by SAHRA.

Comment

The SAHRA APM Unit accepts the submitted PIA and the recommendations provided therein. The recommendations provided by the heritage specialists should be adhered to. As previously stated, SAHRA cannot provide any comments in terms of section 38(4) or section 38(8) as the EA application process has been completed, however, SAHRA urged the applicant to abide by conditions in order to avoid damaging heritage resources as per section 35(4) of the NHRA. Conditions that should still be adhered to include:

- The recommendations of the specialist walk down report and the PIA should be adhered to; and
- 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 APM Unit (Natasha Higgitt/Phillip Hine 021 462 5402) must be alerted. If unmarked human burials are uncovered, the SAHRA Burial Grounds and Graves (BGG) Unit (Thingahangwi Tshivhase/Mimi Seetelo 012 320 8490), must be alerted immediately. A professional archaeologist or palaeontologist, depending on the nature of the finds, must be contracted as soon as possible to inspect the findings. 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.

**AIA FOR THE PROPOSED SEKGAME ELECTRICITY INFRASTRUCTURE
EXPANSION PROJECT, SISHEN MINE**

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

Yours faithfully

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

ADMIN:

Direct URL to case: <http://www.sahra.org.za/node/279907>