



Interim Comment

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

Attention: Ms Melissa Naidoo
SSI Environmental
PO Box 867
Gallo Manor
2052
Johannesburg

Proposed construction of a 15 km pipeline from farm 391 Sand Draai Portion 0 and 5 to farm 390 Bokpoort portion 0 near Upington, Northern Cape Province

Dreyer, C. November 2012. *First Phase Archaeological and Cultural Heritage Assessment of the Proposed Water Pipeline from Sanddraai 391 to Bokpoort 390, Groblershoop, Northern Cape.*

Solafrica Thermal Energy (Pty) Ltd has proposed the establishment of a 15km long pipeline to pipe water from the Orange River to the CSP plant on Bokpoort 390 in the Siyanda District Municipality, Northern Cape, for which they have already received Environmental Authorisation. The pipeline was initially intended to be aligned within the Transnet reserve, but as this was not possible, it will lie north of the servitude.

SAHRA requested a Heritage Impact Assessment (HIA) for the new alignment of the pipeline. The HIA submitted (Dreyer, C. 6 November 2012) does not meet the SAHRA minimum standards for report writing. These minimum standards have been widely circulated to ASAPA members and include the following criteria which were not met in this report:

- Archaeological Background Information must be case and site specific, for example: 1) previous assessments and research undertaken in the vicinity of the project area, 2) types of heritage resources likely to be encountered, 3) discussion of the archaeological sequence must be focused on the geographical area of the project. While a bibliography is required in order to list your sources, these must be referred to in the text to have any relevance. Supplying a bibliography does not obviate the need to provide the archaeological background information.
- The methodology must be site-specific and strictly relevant to the proposed project. The author must include information on how the survey was conducted, time spent conducting the survey, the total area inspected and any limitations experienced. Areas not surveyed must be indicated. A GPS track of the surveyed area is necessary.
- All reports submitted to SAHRA must include a detailed description of the project area, for example 1) previous land use, 2) current land use, 3) topography of the area, 4) landscape qualities.
- Where possible information about the historical development of the greater project area should be provided.
- All heritage resources must be properly assessed and mapped. Relevant information must include the





type of resource, relative age, state of preservation, the size of the site, and if any impact is envisaged for the site.

Furthermore, it is not at all clear from the report whether or not a proper assessment of the study area was conducted. In addition, the images used for the Stone Age scatter, which is "arbitrarily" dated to the Middle Stone Age, is exactly the same as the image used in a 2006 report by the same author, leading us to believe that a new assessment of the scatter was not undertaken. Moreover, the author states that no mitigation is required despite SAHRA having already issued a destruction permit for the very same site to the author and renewed that permit for the applicant in October this year.

SAHRA therefore considers this report to be fatally flawed and requests that a comprehensive report be submitted that complies with the established Minimum Standards, including GPS trackways that provide evidence of the areas inspected by the archaeologist, evidence of background research, photographs related to the development and cultural resources that are current, assessment of other work conducted in the area and a comprehensive Palaeontological Impact Assessment, undertaken by a professional palaeontologist, or letter from a professional palaeontologist requesting an exemption from this study. If the Stone Age scatter for which a destruction permit has already been issued has not been destroyed yet, evidence of this must be provided.

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

Yours faithfully



Kathryn Smuts
Heritage Officer: Archaeology
South African Heritage Resources Agency



Colette Scheermeyer
SAHRA Head Archaeologist
South African Heritage Resources Agency





ADMIN:

(DEA, Ref: 14/12/16/3/3/1/591)

