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31 August 2022

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**MULILO DE AAR PV EA VALIDITY EXTENSION – SUPPLEMENTARY LETTER TO SAHRA
CASE ID: 19027**

Dear Natasha

Thank you for providing a comment (dated 30 August 2022) on the heritage inputs to the EA Validity Extension application being undertaken for the Mulilo De Aar PV project. The present letter provides a response in the hope that a final comment will be issued by SAHRA to allow the project to proceed as per the conditions of the existing Environmental Authorisation (EA). We believe there may have been some misunderstanding / miscommunication which we trust will be set straight in this letter.

Relevant documents are as follows:

- Notification Letter distributed by the EAPs as the first phase in their public participation process (dated 6 July 2022)
- Mulilo De Aar PV EA Validity Extension – Heritage Input (dated 17 July 2022)
- SAHRA Interim Comment (dated 8 August 2022) responding to Notification letter
- SAHRA Interim Comment (dated 30 August 2022) responding to Heritage Input

The 30 August interim comment notes that the reference number for the original EA issued on 9th July 2012 was not provided. This was an error on our part and the number is: 12/12/20/2499.

It also notes that it was unclear whether an assessment of the impact to heritage resources was undertaken during the 2012 EIA process. Note that the original assessments were done according to SAHRA's requirements at the time, it was comprehensive and approved by SAHRA. The 2012 EIA states that a Heritage Impact Assessment (HIA) was undertaken by ACO Associates (Mr Jayson Orton). The HIA included an assessment of archaeological resources, the built environment, cultural landscapes, scenic routes and sense of place. A Paleontological Impact Assessment was also undertaken by Natura Viva (Dr John Almond), while the EIA included a Visual Impact Assessment. The reference in your comment to the studies conducted in 2012 is correct and these studies can be referred to should further information be required.

I note that an interim comment was also issued by SAHRA on 8 August 2022. This comment was based on the Notification Letter which contained no heritage information and was *after* compilation of the 17 July letter (which had not yet been submitted) and was thus not taken into consideration in the 17 July Interim Comment. Because heritage resources are NOT affected by administrative changes to the EA, the document submitted to SAHRA focused on providing the information required by DFFE. It must be stressed

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that the DFFE's concern regarding changes to the receiving environment is a general comment that does not apply equally to all disciplines. For example, an area may have come under cultivation in the intervening time and the loss of such land would have a far higher impact to agricultural resources than it would have had the land remained untilled. When greater impacts are expected it is required by DFFE that assessments be updated. In the case of heritage, however, it was determined through the analysis of aerial photography **that there was no change to the status of the land**. Furthermore, while working on another project that connects to the De Aar PV substation (see Google Earth image below showing survey tracks) the vicinity of the site was visited and **its unchanged status was confirmed. No finds were made in the area**. This was due to a combination of two factors:

- (1) Finds over and above isolated background scatter artefacts **were not expected** to be made in the open, flat grasslands. This contention is supported by numerous projects in the area by the present writer and other practitioners; and
- (2) The grass was much denser this year than in the past due to the excellent rainfall that was received by much of the Karoo last summer (see photograph below). This meant that visibility was poorer and that it can **thus be expected that fewer finds would be made in 2022 (if a new survey was done) than was the case in 2011/2012**. A case in point is the archaeological mitigation of a previously recorded scatter recently carried out by CTS Heritage in which just six stone artefacts could be located.¹

It was noted in the 17 July Heritage Input Letter that significant fossils within solid bedrock will be deeply buried beneath the soils and calcretes of the surficial deposits. The only fossils present at the surface are deemed to be of **low cultural significance** due to being very common (calcretised root casts and fossil wood fragments). It is *impossible* for any change to the deeply buried and potentially fossiliferous bedrock to have occurred since 2012.

The following conclusions can be drawn:

- (1) Further work on this site would not reveal anything new; and
- (2) Construction of the facility after July 2022 will not result in any different impacts or any increases in significance compared to constructing it before July 2022.

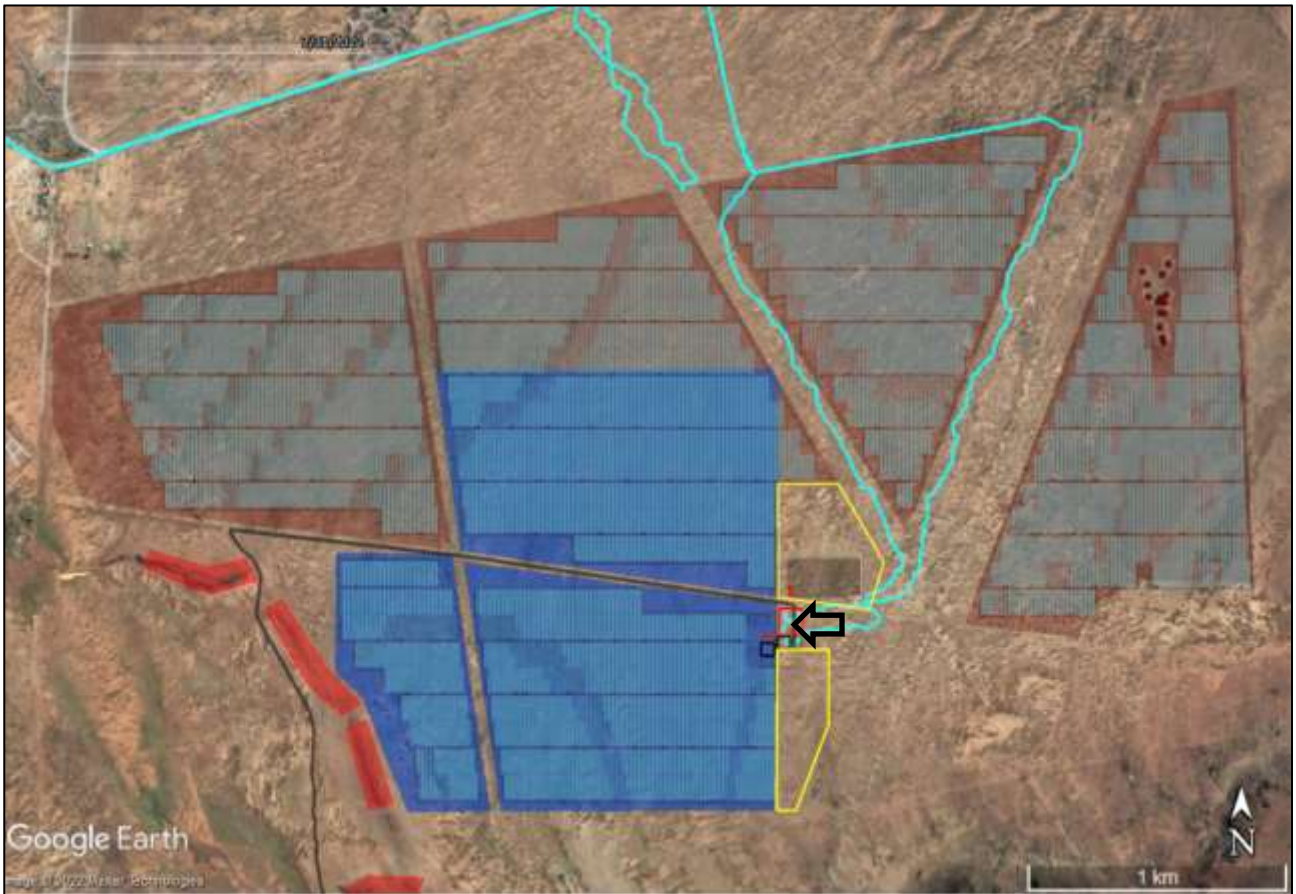
We trust that SAHRA's request for further studies was based on possible miscommunication on our part (for which we apologise) and we trust that this letter makes it clearer that further studies will not serve any purpose and that the outcome of the requested studies will not differ. They might, in fact, be less accurate than the studies done in 2011/2012. It is thus requested that SAHRA approves the EA Validity Extension application and issues final comment.

Yours sincerely



Jayson Orton

¹ CTS Heritage. 2022. Archaeological Specialist Study In terms of Section 38(8) of the NHRA for a Proposed Development of the Vetlaagte infrastructure associated with the authorised PV Facilities near De Aar. Detailed Site Recording at SA03, SAHRIS ID 34471. Report for Landscape Dynamics. Plumstead: CTS Heritage.



Aerial view of the Mulilo Total Hydra Storage Facility with the De Aar PV section highlighted in blue and areas to be avoided on heritage grounds shaded in bright red. The black arrow indicates the position and direction of the photograph shown below. The turquoise lines are from a field survey carried out for another project on 19 April 2022.

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View towards the west across the De Aar PV footprint area taken on 19 April 2022. The foreground shows the remains of what is assumed to be a geotechnical excavation, while in the background the dense grass cover can be seen. The project extends to just before the dolerite ridge visible on the skyline.