

Our Ref:



an agency of the  
Department of Arts and Culture

T: +27 21 462 4502 | F: +27 21 462 4509 | E: info@sahra.org.za  
South African Heritage Resources Agency | 111 Harrington Street | Cape Town  
P.O. Box 4637 | Cape Town | 8001  
www.sahra.org.za

Enquiries: Natasha Higgitt  
Tel: 021 202 8660  
Email: nhiggitt@sahra.org.za  
CaseID: 18998

Date: Friday July 14, 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: Glencore Operations South Africa (Ptd) Ltd

**The applicant wishes to develop a Solar Photovoltaic (PV) Energy Generation Facility at the Rhovan Vanadium Mine. The generation capacity will be 25 megawatts (MW). The Project is located in North West, South Africa**

Environmental Impact Management Services (EIMS) has been appointed by Glencore (Pty) Ltd to conduct an Environmental Authorisation (EA) Application for the proposed development of a Solar PV Energy Generation Facility at the Rhovan Vanadium Mine (within the mining right boundary) on Portion 0 of the Farm Leeuwpen 403 JQ, Portion 0 of the Farm Beestkraal 397 JQ and RE of Portion 2 of the Farm Losperfontein 405 JQ within the Rustenburg Local Municipality, Bojanala Platinum District, North West Province.

A draft Scoping Report (DSR) has been submitted in terms of the National Environmental Management Act, no 107 of 1998 (NEMA) and the NEMA Environmental Impact Assessment (EIA) Regulations. The proposed development will entail the construction of a 25 MW PV facility with associated infrastructure which will include a 11kV power line, access roads, vegetation clearance.

Several Interim Comments have been issued on the case, requesting that an application specific HIA be conducted for the proposed PV facility. In the most recent Interim Comment issued on the 23/11/2022, SAHRA requested that the HIA be revised to correct some inconsistencies. Since the issuing of the Interim Comment, an updated HIA and EIA have been submitted for review.

*Fourie, W. 2022. Heritage Impact Assessment report for the proposed Glencore Rhovan Solar Photovoltaic Facility*

The updated HIA shows the correct results of the assessment, noting that three heritage resources of medium heritage significance were identified within the proposed development area.

Recommendations provided in the report include the following:

- A phase II field assessment that will include vegetation clearance of the structures to determine the

Our Ref:



an agency of the  
Department of Arts and Culture

T: +27 21 462 4502 | F: +27 21 462 4509 | E: [info@sahra.org.za](mailto:info@sahra.org.za)  
South African Heritage Resources Agency | 111 Harrington Street | Cape Town  
P.O. Box 4637 | Cape Town | 8001  
[www.sahra.org.za](http://www.sahra.org.za)

Enquiries: Natasha Higgitt  
Tel: 021 202 8660  
Email: [nhiggitt@sahra.org.za](mailto:nhiggitt@sahra.org.za)  
CaseID: 18998

Date: Friday July 14, 2023  
Page No: 2

extent of the site and test excavation where deposits or midden areas are identified during the vegetation clearing must be conducted. This will aim to identify the cultural affinity, temporal depth, and settlement layout. The Phase 2 study can only be conducted after a permit is issued to the competent archaeologist under s35 of the NHRA;

- Upon completion of the Phase 2 study, a permit for destruction can be lodged with SAHRA with the backing of the Phase 2 report as completed by the archaeological specialist;
- A Chance Finds Procedure is recommended to be implemented.

## 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 EIA and EMP:

- 38(4)a – The SAHRA Development Applications Unit (DAU) has no objections to the proposed development;
- 38(4)b – Further additional specific conditions are provided for the development as follows:
- Permits in terms of section 35(4) of the NHRA must be applied for to conduct the recommended phase II field assessment including test pits prior to construction;
- 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 offence 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 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 offence 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;

Our Ref:



an agency of the  
Department of Arts and Culture

T: +27 21 462 4502 | F: +27 21 462 4509 | E: [info@sahra.org.za](mailto:info@sahra.org.za)  
South African Heritage Resources Agency | 111 Harrington Street | Cape Town  
P.O. Box 4637 | Cape Town | 8001  
[www.sahra.org.za](http://www.sahra.org.za)

Enquiries: Natasha Higgitt  
Tel: 021 202 8660  
Email: [nhiggitt@sahra.org.za](mailto:nhiggitt@sahra.org.za)  
CaseID: 18998

Date: Friday July 14, 2023  
Page No: 3

- The Final EIA and EMPr must be submitted to the SAHRIS application for record purposes;
- 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

---

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

---

**ADMIN:**

Direct URL to case: <https://sahrissahra.org.za/node/600513>

**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.