



SOUTH AFRICAN HERITAGE RESOURCES AGENCY
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DATE: 11 August 2011
ENQUIRIES: Dr Mariagrazia Galimberti
Archaeology, Palaeontology and Meteorite Unit
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OUR REF: 9/2/032/0001

Mr Shawn Johnston
Sustainable Futures ZA
PO Box 749
Rondebosch
Cape Town
7701

Dear Mr Johnston,

REQUEST FOR A HERITAGE IMPACT ASSESSMENT: ESTABLISHMENT OF THREE PROPOSED PHOTOVOLTAIC PLANTS NEAR KEIMOEES, NORTHERN CAPE PROVINCE

Thank you for your indication that three solar plants are proposed to be established in this area.

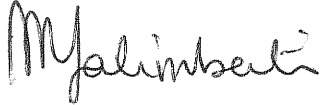
In terms of the National Heritage Resources Act, no 25 of 1999, heritage resources, including archaeological or palaeontological sites over 100 years old, graves older than 60 years, structures older than 60 years are protected. They may not be disturbed without a permit from the relevant heritage resources authority. This means that before such sites are disturbed by development it is incumbent on the developer to ensure that a **Heritage Impact Assessment** is done. This must include the archaeological component (Phase 1) and any other applicable heritage components. Appropriate (Phase 2) mitigation, which involves recording, sampling and dating sites that are to be destroyed, must be done as required.

According to the Background Information Document, heritage has already been identified as a possible impact associated with solar facilities. Heritage resources that may be impacted upon are archaeological, palaeontological, built structures over 60 years old, sites of cultural significance associated with oral histories,

burial grounds and graves, graves of victims of conflict, and cultural landscapes or viewsapes.

SAHRA will therefore comment on the Heritage Impact Assessment once it is submitted for review.

Yours sincerely

A handwritten signature in black ink, appearing to read 'M. Malimbe', written in a cursive style.

PP Mrs Nonofho Ndobochani
SAHRA: Archaeology, Palaeontology and Meteorite Unit
For: CHIEF EXECUTIVE OFFICER

Copy: PHRA Northern Cape Office



agriculture, forestry & fisheries

Department:
Agriculture, Forestry and Fisheries
REPUBLIC OF SOUTH AFRICA

Directorate: Forestry & Natural Resource Management
P.O. Box 2782, Upington, 8800, Tel 054 338 5860, Fax 054 334 0030

Enquiries: J Mans
E-mail: JacolineMa@daff.gov.za
Date: 14 October 2011
Ref: F13/11/2/98

Sustainable Futures
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CAPE TOWN
7701

ATTENTION: Mr. Shawn Johnston (swjohnston@mweb.co.za)

RE: COMMENTS ON DRAFT SCOPING REPORT (DSR) AND THE SPECIALIST ECOLOGICAL STUDY FOR THE PROPOSED OFIR ZX PHOTOVOLTAIC PLANT, KEIMOES (DEA REF No. 12/12/20/2229)

The Directorate: **Forestry** and Natural Resource Management within the National Department of Agriculture, Forestry and Fisheries (DAFF) would hereby like to make the following comments on the above-mentioned proposed development:

1. The sensitivity map, Figure 5.1 on page 49 (electronic copy page 64 of 100) of the DSR refers. The Department of Forestry recommends that the exact layout of the proposed facility be placed in such a manner that it avoids the areas in red, classified as areas with 'high' environmental sensitivity.
2. The specialist ecological study refers. The proposed development may not impact on the small portion of land consisting of the Lower Gariep Alluvial Vegetation which is classified as 'endangered'
3. Page 23 of the specialist ecological study refers to the National Forests Act, stating that GN 1042 provides a list of protected tree species. Please note that GN 34595 NN 734 of 16 September 2011 provides the latest list of protected tree species.
4. Page 33 of the ecological study mentioned that the presence of protected plants on site will be evaluated during the EIA phase. The likelihood of protected trees be present on site is high. Obtaining a Forest Act License for the disturbance of protected trees is not guaranteed. An effort should be made to avoid or minimize the impact on protected tree species. If not possible and mitigation cannot adequately address the residual impact, a biodiversity offset might be required to compensate for the permanent loss of protected tree species in this arid region.

5. The Department of Forestry is very interested in the recommended mitigation measures that must address the impact on protected plants, if applicable. No recommendations were included in the ecological study. The DAFF is kindly requesting a copy of the Environmental Management Programme (EMP) during the EIA phase to assess the recommendations. Forestry would like to comment on the proposed mitigation measures and the EMP should it be deemed necessary.

Yours truly,



Jacoline Mans
Chief Forester: NFA Regulation

