



an agency of the
Department of Arts and Culture

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South African Heritage Resources Agency | 111 Harrington Street | Cape Town
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Case ID: 23611

Date: Wednesday, 16 July, 2025

Interim Comment

In terms of Section 38(3) of the National Heritage Resources Act (Act 25 of 1999)

Elijah Dumisani Katsetse
CES Environmental and Social Advisory
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P.O Box 8145, Nahoon, East London, 5210
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6140

1. Exigent Engineering Consultants CC were appointed by Genam Energy (Pty) Ltd to undertake an Environmental Authorisation (EA) for the proposed Doornburg Solar Park and Connection Infrastructure on Portions 9, 23, 28,29,30 & 42 of farm Doornburg 302 JS within the eMalahleni Local Municipality, Mpumalanga Province.
2. A Basic Assessment Report (BAR) was submitted in terms of the National Environmental Management Act, Act. No. 107 of 1998 (NEMA) and the Environmental Impact Assessment (EIA) Regulations, 2014 as amended. The proposed Solar Park includes the removal of vegetation, construction of a Solar PVF, power plant, 132 kV double circuit, on-site 33kV/132kV substation, transformers, busbar with switching station, powerlines. The Solar Park will be supported by the proposed construction of a workshop and warehouse, control buildings, internal roads and fencing.
3. Prof. Marion Bamford and Environmental and Social Advisory Services were appointed to undertake specialist Palaeontological and Heritage Impact Assessments for input in the EA process in terms of section 38(8) of the National Heritage Resources Act, Act No. 25 of 1999 (NHRA) and section 24(4)b(iii) of NEMA.
4. The desktop Palaeontological Impact Assessment (PIA) report contains results which excludes the assessment of Portions 23, 28 and 40 while the Heritage Impact Assessment (HIA) report contain results which exudes the assessments of Portion 28 of the Farm Doornrug 302 JS.

Interim Comment:

The SAHRA Development Applications Unit (DAU) is making the following comments in terms of section 38(8) of the National Heritage Resources Act as contemplated by the EIA process in terms of section 24(4)b(iii) of NEMA:

- The SAHRA DAU acknowledges the submissions of the HIA and desktop PIA reports.



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- The reports are incomplete as not all areas in the proposed development footprint were assessed.
- The Final Basic Assessment Report, dated June 2025, outlines the entire proposed development footprint as discussed in paragraph 1.
- The SAHRA DAU understand that the finalisation of the BAR had impact on the final layout of the proposed development as the HIA is dated 3 months before the Final BAR and the PIA is dated 10 months before.
- The applicant is therefore advised to fully comply with the provisions of the NHRA by assessing all remaining Portions for both the HIA and PIA studies and revise the reports to incorporate the findings.
- Further comments will be issued upon receipt of the revised HIA and PIA reports with substantive evidence of the assessment of the remaining portions.

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

Yours faithfully

John Pakwe
Heritage Officer: Development Applications Unit
South African Heritage Resources Agency



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

ADMIN:

Direct URL to case: <https://sahris.org.za/node/352999>