



an agency of the  
Department of Arts and Culture

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CaseID: 17429

Date: Monday September 11, 2023  
Page No: 1

## Interim Comment

### In terms of Section 38, 36(3), 35 of the National Heritage Resources Act (Act 25 of 1999)

Attention: Bertus Bierman  
Lebalelo Water User Association  
8 Charbury Road, Lynnwood Manor, Pretoria, 0081

### Construction of the SE2 pipeline and associated infrastructure near Steelpoort, Limpopo Province.

Alta van Dyk Environmental was appointed by Lebalelo Water User Association (LWUA) to conduct an Environmental Authorisation (EA) Application for the proposed SE2 Pipeline and associated infrastructure, near Steelpoort, Limpopo Province (DFFE Reference Number: 14/12/16/3/3/1/2442).

A draft Basic Assessment Report (DBAR) was submitted in terms of the National Environmental Management Act, Act 107 of 1998 (NEMA) and the NEMA EIA Regulations (As amended). The proposed development will include a new pump station at existing Spitskop Pump Station, solar panels, new 500 m pipeline (15 km) from Spitskop Pump Station to Dwarsrivier Pump Station with the current pipeline servitude, new concrete reservoir, new pump station adjacent current Dwarsrivier Pump Station, and new 300 mm or 350 mm (9 km) from the new Dwarsrivier Pump Station to the Motololo Mine with current pipeline servitude.

In a Final Comment issued on 17/01/2022, SAHRA noted no objections to the proposed development and provided conditions for the development (<https://sahris.sahra.org.za/node/591032>), which included monitoring of the construction and monitoring reports. The EA was issued on the 28/04/2022, and an amended EA was issued on the 16/08/2022.

During construction, local community members raised concerns that graves identified at site LWUA 1 were being negatively impacted by the construction. Kudzala Antiquity CC was appointed to inspect the reported impacts and a report was submitted for review (07/08/2023).

*Celliers, J. P. 2023. A Report on the impact on identified graves by construction of the water pipeline (SE2) between Spitskop Pump Station and Mototolo Mine, located near Steelpoort, Limpopo Province*

The report concludes that the identified graves at site LWUA 1 are located more than 30 m from the pipeline construction. A second stone packed grave (SP12) was noted, that had not been identified as part of the HIA. This grave is located 22 m from the pipeline and is not currently negatively affected by the pipeline

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Page No: 2

construction. The trench was inspected for any human remains, of which none were identified.

Recommendations provided in the report include the following:

- All identified graves must be fenced or demarcated and to include at least a 10 m buffer to avoid physical impact;
- Continued monitoring by the ECO should be implemented;
- If impact is unavoidable, a process of social consultation in accordance with section 36 of the NRHA should be followed.

A second report was submitted on the 29/08/2023 pertaining to identified human remains within the pipeline trench.

*Hutten, L. 2023. Preliminary skeletal report.*

During the construction of the trench for the pipeline, several bones were identified. These have been positively identified as human remains, of one human adult. The remains were identified only 650 mm from the surface and no other material was identified.

Recommendations provided in the report include the following:

- The area is left undisturbed and an alternative route for the pipeline is excavated;
- If this is not a viable option, the remains should be exhumed, analysed and then reburied or sent to a formal repository for human remains.

### Interim Comment

SAHRA is satisfied that there are no impacts to the identified grave site LWUA 1 and SP12. The 30 m buffer from identified graves must be adhered to with the exception of SP12, where the 22 m between the grave and the construction must be maintained with continued monitoring of all construction in the area by the ECO.

Regarding the identified human remains within the trench, SAHRA requests a full report of the find be submitted by an archaeologist i.e. location of the find with a map, surface indicators, possible construction alternatives, including the proposed mitigation measures.

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Page No: 3

Further comments will be provided upon receipt of the above requested report.

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

Yours faithfully

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

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**ADMIN:**

Direct URL to case: <https://sahris.sahra.org.za/node/588053>  
(DEA, Ref: 14/12/16/3/3/1/2442)