



EASTERN CAPE
PROVINCIAL HERITAGE
RESOURCES AUTHORITY

SOUTH AFRICA

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Dear Ms Myingwa

RE: HIA REVIEW COMMENT FOR THE TOMBO ELECTRIFICATION PROJECT INCLUDING THE ASSESSMENT OF A GRAVE ALLEGEDLY UNCOVERED BY ESKOM WORKERS

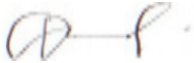
The Eastern Cape Provincial Heritage Resources Authority (ECPHRA) herewith acknowledges receipt of a two-in-one HIA report prepared for Eskom by the CTS. Eskom had approached the heritage specialist to survey the area of proposed development and prepare the required HIA report in accordance with the requirements of section 38 of NHRA.

1. ECPHRA does not accept this report as it is, being a two-in-one report. We accept separate AIA and PIA.
2. Over two years back ECPHRA issued a statement to ASAPA following consultations with SAHRA requesting independent heritage practitioners to submit separate reports (that is, AIA and PIA) separately by different specialists. Although SAHRA did not support this approach, ECPHRA went on with its implementation. We had subsequently declined a number of such two-in-one reports.
3. The AIA component lacks details on the alleged uncovered grave. Whose grave is this? The recommendation to just “cover it in soil” without following the necessary reburial protocols is totally unacceptable. It is not about it not being archaeological; the grave enjoys protection under section 36 of NHRA. The deceased must be afforded the respect they deserve (**see s.36 NHRA; Vermillion Accord on Human Remains WAC 1989**).
4. The PIA component of this report too, is totally unacceptable.
 - No references
 - No geological map

- The palaeontologist does not meet the minimum requirements for accreditation to work independently

ECPHRA requests submission of separate AIA and PIA reports that will help us to comment on the development and the allegedly uncovered grave.

Kind regards

A handwritten signature in brown ink, appearing to read 'Sello Mokhanya'.

Sello Mokhanya