

11 November 2013

SAHRIS Ref: Case 3873  
SAHRA Ref: 9/2/222/0002  
DEA Reference: 14/12/16/3/3/1/54

Attention: Ms Jenna Lavin  
Organisation: SAHRA

**RECTIFICATION OF UNLAWFUL COMMENCEMENT OR CONTINUATION OF A LISTED ACTIVITY IN TERMS OF S24G OF THE NATIONAL ENVIRONMENTAL MANAGEMENT ACT, 1998 (ACT NO. 107 OF 1998), AS AMENDED - UNDERGROUND COAL GASIFICATION PILOT PLANT PHASE 1, AMERSFOORT, MPUMALANGA**

The letter received on 07 November 2013 refers.

The main concerns raised were: *"It is noted that the HIA identified a number of heritage resources within the project area that may have been impacted by the unauthorised work. Based on the submitted information, SAHRA is unable to determine what impact the unauthorised work has had on heritage resources. As such, SAHRA requires a heritage impact assessment that assesses the impacts of the unauthorised work on all heritage resources including, but not limited to, those heritage resources identified in the HIA dated May 2013 by J. van Schalkwyk.*

*This assessment must include a map of the identified heritage resources in relation to the unauthorised work."*

As mentioned in the communication dated 05 November 2013, the following contraventions have been applied for in terms of the Rectification Application process as well as the approximate date of the contravention:

Contravention	Commencement Date
Pipelines internal to site: main gas pipeline to Majuba Power Station	2006 (between July 2005 and January 2007)
Raw water dam	Before March 2006
Condensate (process water dam)	July 2006
Borrow pit	January 2008
Access/gasifier roads	2008 – 2010 (progressive usage over the total time period)
Gas Treatment Plant (GTP)	2010
Hazardous substance storage (diesel)	February 2010
Water Treatment Plant (WTP)	2010

The impact of the above unauthorised infrastructure on heritage resources cannot be determined as these contraventions go back as early as 2005 and the baseline conditions were not determined. However, it should be reiterated that no new construction has taken place on site since the above contraventions (2010) and the unauthorised infrastructure has not impacted the identified heritage resources as indicated on the heritage resources map (*Annexure A*).

The heritage assessments compiled by Johnny van Schalkwyk from 2009 – 2012 (most updated version loaded onto the SAHRIS system) have documented all objects of heritage significance encountered on the farm Roodekopjes 67HS as well as mitigation measures and recommendations. The specialist reiterated that if development has to take place in the vicinity of any of the identified heritage objects (farmsteads, homesteads, informal cemeteries), these sites should be fenced off with danger tape declaring them as no-go zones with sufficient large buffer zones (approximately 10 m) around them for protection.



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The map of the identified heritage resources in relation to the unauthorised work is attached as *Annexure A*.

We trust that you find the above in order. Should you wish to discuss the contents of the letter with the project team, we would be happy to arrange a teleconference.

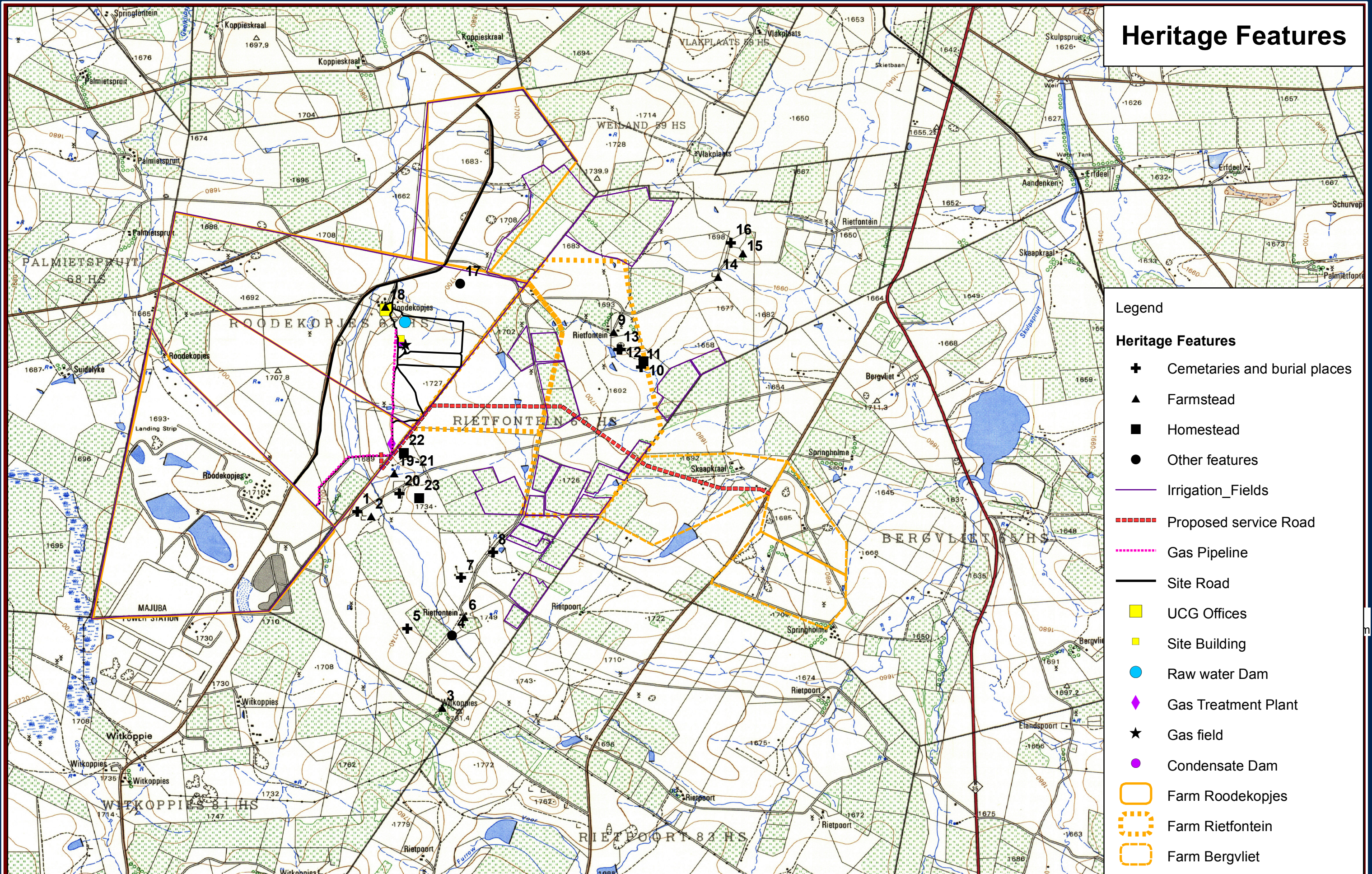
Regards

Prashika Reddy  
Royal HaskoningDHV

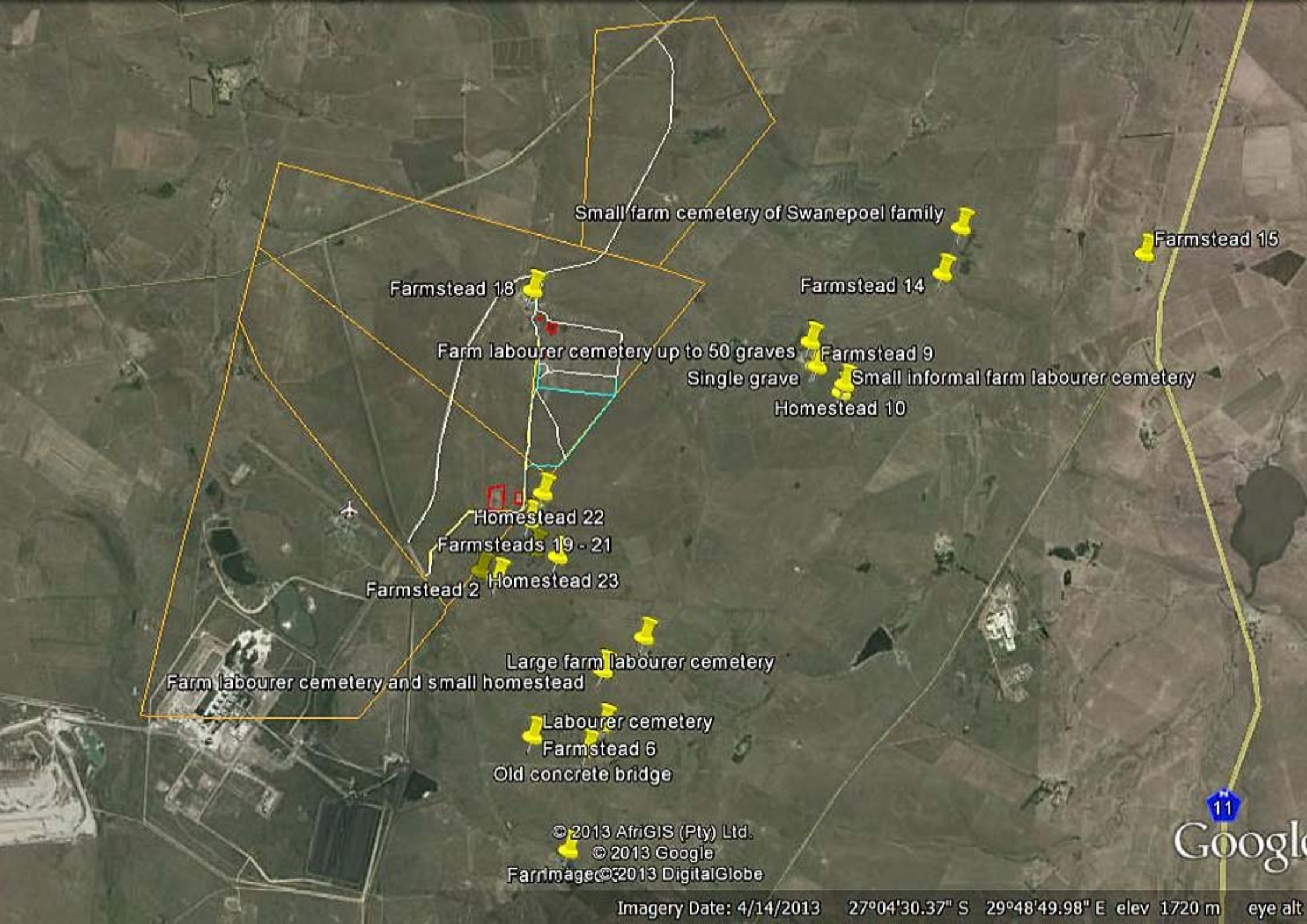
## Annexure A



# Heritage Features







Small farm cemetery of Swanepoel family

Farmstead 15

Farmstead 18

Farmstead 14

Farm labourer cemetery up to 50 graves

Farmstead 9

Single grave

Small informal farm labourer cemetery

Homestead 10

Homestead 22

Farmsteads 19 - 21

Farmstead 2

Homestead 23

Large farm labourer cemetery

Farm labourer cemetery and small homestead

Labourer cemetery

Farmstead 6

Old concrete bridge

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Imagery Date: 4/14/2013 27°04'30.37" S 29°48'49.98" E elev 1720 m eye alt