

09 January 2013

Phillip Hine
PO Box 4637
Cape Town
8000

Dear Mr Hine

ENVIRONMENTAL IMPACT ASSESSMENT AND WASTE MANAGEMENT LICENSE APPLICATION FOR THE UNDERGROUND COAL GASIFICATION PROJECT AND ASSOCIATED INFRASTRUCTURE IN SUPPORT OF CO-FIRING OF GAS AT THE MAJUBA POWER STATION, AMERSFOORT, MPUMALANGA (Ref 14/12/16/3/3/61)

Please receive herewith our confirmation of receipt of your comment form received on 03 December 2012. Your comments and concerns have been noted in the Issues Trail and have been addressed as follows.

Comment	Response
<p>The heritage scoping report submitted to SAHRA APM Unit mentions that the survey was conducted for the development area, whilst the rest of the area was subject to a desktop assessment. Considering that the project requires additional infrastructure such as access roads, an extra waste water treatment plant, a power line and a fire break which could involve significant disturbance of the study area, it is not clear if the archaeologist investigated all the areas that will be earmarked for infrastructure development. This is because according to the draft Scoping Report additional infrastructure will not be located on the farm Roodekopjes 67HS, but rather on farms Bergvliet 65HS and Rietfontein 66HS. In addition, a palaeontological assessment was not undertaken for the proposed project. This is normally compiled by a professional palaeontologist.</p>	<p>The heritage scoping report is a desk-top assessment conducted to determine the presence of any objects of heritage significance supplemented by a site visit. During the EIA phase, a more detailed site visit will be taken for the entire study area (farm Roodekopjes 67HS – Ptns 1, 2, 3 and remaining extent; Ptns 17 and 21 o the farm Bergvliet 65HS and Ptns 4 and 5 of the farm Rietfontein 66HS). A Phase I Paleontological Assessment was conducted by Prof Marion Bamford and a report compiled on 30 November 2012. The Phase I Palaeontological Assessment as well as letter of exemption were forwarded to SAHRA (Mariagrazia Galimberti on 30 November 2012). A copy of the report as well as the letter of exemption we uploaded onto the SAHRIS system on 03 December 2012.</p>
<p>The archaeologist did identify heritage resources on the property, although these are only described very briefly and not in acceptable detail. Since this is a scoping heritage assessment, it is expected that the actual heritage impact assessment will indeed address the missing information that would then enable informed comments from the SAHRA APM Unit.</p>	<p>The heritage impact assessment conducted during the EIA phase will address the missing information and will be forwarded to SAHRA for comment.</p>
<p>The following aspects should be considered in the heritage report:</p> <ul style="list-style-type: none"> - The reference list must be reflected in the text and it must be clear which type of heritage resources are present in the broader areas and what could be expected on site. 	<p>Noted. These requirements have been forwarded to the appointed heritage consultant to incorporate into the study as well as report.</p>



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Comment	Response
<ul style="list-style-type: none"> - Full survey of the area impacted by the development including areas dedicated to the establishment of ancillary infrastructure. - Detailed description of each identified heritage resource. - Description of the survey methodology including GPS trackways of the areas surveyed. - Since in most sections dense vegetation has limited archaeological visibility, the specialist must make provision for an alternative plan. If it is expected that the survey undertaken is a reflection enough of the heritage sensitivity of the area, the author should say so, otherwise monitoring or another source of mitigation must be proposed. - Proposed mitigation measures must be site specific: a general section such as the following is not enough for heritage resources of different origin and with different requirements. <i>Mitigation should take the form of isolating known sites and declare them as no-go zones with sufficient large buffer zones around them for protection. In exceptional cases mitigation can be implemented after required procedures have been followed.</i> - Palaeontological assessment that must be undertaken by a professional palaeontologist or a letter of exemption from further palaeontological studies if the specialist deems it sufficient. - It is noted that a palaeontological report has since been submitted to SAHRA APM Unit. 	
<p>The specialist mentions that as the development details for the larger region is not yet available, this would be subjected to intensive surveys once these details are available. SAHRA expects the next report to include these areas.</p>	<p>This statement is indeed correct. UCG technology will only be implemented on the farm Roodekopjes 67HS during this phase of the study. There are plans to expand UCG operations into the surrounding farms, however, this does not fall under the scope of this study. As soon as Eskom decides to scale the operations to a full-scale commercial operation and incorporate the adjacent farms, this study will be subject to a new EIA study and mining rights application.</p>
<p>The report must reflect the scope of the proposed project. It is advisable that the specialist receives all available information regarding the proposed project before the field survey is conducted.</p>	<p>Noted. These requirements have been forwarded to the appointed heritage consultant to incorporate into the study as well as report.</p>
<p>SAHRA APM Unit awaits the updated report before issuing further recommendations regarding this case.</p>	<p>The heritage impact assessment report will be uploaded onto the SAHRIS online system as soon as it is available.</p>

Please accept herewith our appreciation for participating in the EIA process. If you require any further information please do not hesitate to contact me.

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 Royal HaskoningDHV
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Yours sincerely,

A handwritten signature in cursive script, appearing to read "Prashika Reddy".

Prashika Reddy