



Enquiries: Natasha Higgitt
Tel: 021 202 8660
Email: nhiggitt@sahra.org.za
CaseID: 14284

Date: Monday February 27, 2023
Page No: 1

Final Comment

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

Attention: Senkosi Environmental

Sasol applied to Eskom Holdings several years ago for the integration of their new Open Cycle Gas Turbine plant into Eskom's North East transmission and distribution electricity network as well as requiring that their notified maximum demand be increased from 1100MVA to 1600MVA. Eskom Distribution Northern Region also indicated the need of an alternative 132kV source to the distribution network around the Secunda area due to applications received for new supply points from the mining industry. It was established that the existing Sol Main Transmission Substation (MTS) supplying the area was operating at full capacity and was not be capable of sustaining future load growth and because of voltage dips, concerns were raised regarding the quality of supply from this substation.

Archaeos CC has been appointed by NCC Environmental Services (Pty) Ltd to conduct an assessment of previously identified heritage sites and unidentified burials within the Mulalo 400/132KV Main Transmission Substation (MTS) and associated integration of transmission and distribution lines, near Secunda, Mpumalanga Province.

In 2019, SAHRA issued a Final Comment noting no objections to the proposed development and provided conditions (<https://sahris.sahra.org.za/node/532185>). The conditions included that the identified graves must not be relocated and must be retained in-situ. It was proposed that the proposed location of the MTS be moved 200 m to avoid impact to the graves.

Van Vollenhoven, A. 2022. A Report on an Archaeological Impact Assessment for the Proposed Construction of Mulalo 400/132kv Main Transmission Substation (MTS) and associated integration of Transmission and Distribution Power Lines south of Secunda, Mpumalanga Province

The site visit confirmed the location of four previously identified heritage sites i.e. Site 1 (Burial Ground of high heritage significance) and 3, 4 and 5 (historical structures of low heritage significance). A previously unknown burial ground of high heritage significance was identified (Site 2). It is noted that the previously recommended 200 m no-go buffer around site 1 is no longer possible due to engineering constraints and this applies to Site 2.



an agency of the
Department of Arts and Culture

T: +27 21 462 4502 | F: +27 21 462 4509 | E: info@sahra.org.za
South African Heritage Resources Agency | 111 Harrington Street | Cape Town
P.O. Box 4637 | Cape Town | 8001
www.sahra.org.za

Enquiries: Natasha Higgitt
Tel: 021 202 8660
Email: nhiggitt@sahra.org.za
CaseID: 14284

Date: Monday February 27, 2023
Page No: 2

Recommendations provided in the report include the following:

- Of the five identified sites two are graves. Site 1 is very close to the proposed development and site 2 is located inside the proposed development and both will directly impact by the construction of the substation. Option 2 is therefore recommended for both sites. This is to exhume the mortal remains and then to have it relocated. For this a specific procedure should be followed which includes social consultation. For graves younger than 60 years only, an undertaker is needed. For those older than 60 years and unknown graves an undertaker and archaeologist is needed. Permits should be obtained from the Burial Grounds and Graves unit of SAHRA;
- As further motivation for this, ESKOM have an engineer's report (attached) indicating that the footprint of the development cannot change/move due to the underlying areas being undermined. This is in spite of Beater's (2019) recommendation that the graves should not be relocated. She of course did not have the benefit of knowing the exact layout and circumstances described here;
- Site 3,4 and 5 received field rating of Local Grade IIIC. It means the description in the phase 1 heritage report is seen as sufficient recording (low significance) and it may be granted destruction at the discretion of the relevant heritage authority without a formal permit application, subjected to the granting of Environmental Authorisation;
- The proposed development may continue only after the mitigation measures indicated above had been implemented and approved by SAHRA;
- It should be noted that the subterranean presence of archaeological and/or historical sites, features or artefacts is always a distinct possibility. Care should therefore be taken when development commences that if any of these are discovered, work on site immediate cease and a qualified archaeologist be called in to investigate the occurrence.

Final Comment

The following comments are made as a requirement in terms of section 3(4) of the NEMA Regulations and section 38(8) of the NHRA in the format provided in section 38(4) of the NHRA and must be included in the Final EMP:

- 38(4)a – The SAHRA has no objections to the proposed development and change of mitigation measures;
- 38(4)b – The recommendations of the specialists are supported and must be adhered to. Further additional specific conditions are provided for the development:

Mulalo 400/132kV main transmission substation and associated power line project

Our Ref: 14284



an agency of the
Department of Arts and Culture

T: +27 21 462 4502 | F: +27 21 462 4509 | E: info@sahra.org.za
South African Heritage Resources Agency | 111 Harrington Street | Cape Town
P.O. Box 4637 | Cape Town | 8001
www.sahra.org.za

Enquiries: Natasha Higgitt
Tel: 021 202 8660
Email: nhiggitt@sahra.org.za

Date: Monday February 27, 2023
Page No: 3

CaseID: 14284

- Permits in terms of section 35 of the NHRA must be applied for the destruction of sites 3, 4 and 5 should they prove to be older than 100 years. On site monitoring must be conducted by an archaeologist during the destruction of the sites and a report submitted to SAHRA. If the sites are younger than 100 and older than 60, the Mpumalanga Provincial Heritage Authority must be consulted with regards to the process to follow;
- A consultation process in terms of section 36 of the NHRA and Chapter X of the June 2000 NHRA Regulations must be conducted. If grave relocation is found feasible, a permit application process in terms of section 36 of the NHRA and Chapter II and Chapter IX of the NHRA must be submitted to SAHRA for decision making. No relocation or exhumation may commence without the consultation process and permits issued by SAHRA in this regard. All human remains, regardless of age must be handled by a competent Funeral Undertaker in accordance with the health protocol;
- 38(4)c(i) – If any evidence of archaeological sites or remains (e.g. remnants of stone-made structures, indigenous ceramics, bones, stone artefacts, ostrich eggshell fragments, charcoal and ash concentrations), fossils or other categories of heritage resources are found during the proposed development, SAHRA (Natasha Higgitt 021 202 8660) must be alerted as per section 35(3) of the NHRA. Non-compliance with section of the NHRA is an offense in terms of section 51(1)e of the NHRA and item 5 of the Schedule;
- 38(4)c(ii) – If unmarked human burials are uncovered, the SAHRA Burial Grounds and Graves (BGG) Unit (Thingahangwi Tshivhase/Ngqabutho Madida 012 320 8490), must be alerted immediately as per section 36(6) of the NHRA. Non-compliance with section of the NHRA is an offense in terms of section 51(1)e of the NHRA and item 5 of the Schedule;
- 38(4)d – See section 51 of the NHRA regarding offences;
- 38(4)e – The following conditions apply with regards to the appointment of specialists:
- With reference to the mitigation work noted above, a qualified archaeologist must be appointed to undertake the work in terms of the permit applied for as noted above;
- If heritage resources are uncovered during the course of the development, a professional archaeologist or palaeontologist, depending on the nature of the finds, must be contracted as soon as possible to inspect the heritage resource. If the newly discovered heritage resources prove to be of archaeological or palaeontological significance, a Phase 2 rescue operation may be required subject to permits issued by SAHRA.

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

Yours faithfully

Mulalo 400/132kV main transmission substation and associated power line project

Our Ref: 14284



an agency of the
Department of Arts and Culture

T: +27 21 462 4502 | F: +27 21 462 4509 | E: info@sahra.org.za
South African Heritage Resources Agency | 111 Harrington Street | Cape Town
P.O. Box 4637 | Cape Town | 8001
www.sahra.org.za

Enquiries: Natasha Higgitt
Tel: 021 202 8660
Email: nhiggitt@sahra.org.za
CaseID: 14284

Date: Monday February 27, 2023
Page No: 4

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

ADMIN:

Direct URL to case: <https://sahris.sahra.org.za/node/528066>

Terms & Conditions:

1. This approval does not exonerate the applicant from obtaining local authority approval or any other necessary approval for proposed work.
2. If any heritage resources, including graves or human remains, are encountered they must be reported to SAHRA immediately.
3. SAHRA reserves the right to request additional information as required.