



an agency of the
Department of Arts and Culture

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CaseID: 14284

Date: Friday December 13, 2019

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Final Comment

In terms of Section 38(8) 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.

Sasol (SOC) Ltd has applied to Eskom (SOC) Ltd to increase to be connected to the Mulalo 400/132kV power line transmission corridor for their Open Gas Cycle Plant. A substation and associated power lines are proposed in order to connect them and other Eskom customers to the grid. The proposed substation and associated powerlines will be located in Govan Mbeki Local Municipality of the Mpumalanga Province.

Senkosi Environmental Consulting (Pty) Ltd been appointed to undertake the Scoping and Environmental Impact Assessment (S&EIA) application process in support of an Environmental Authorisation application, made on behalf of the applicant, Eskom Holdings (SOC) Ltd. The application process is in respect of listed activities in the EIA Regulations 2014, as amended, that require an application for Environmental Authorisation in terms of the National Environmental Management Act, 1998 (NEMA)

A Final EIA report, the Heritage Impact Assessment by JLB Consulting, and an addendum to the HIA by JLB Consulting have been submitted to SAHRA in terms of section 38(8) of the National Heritage Resources Act, 25 of 1999 for commenting. SAHRA is revised the 25/10/2019 Interim Comments to specify the recommendations included in the Addendum of the HIA and request that a Palaeontological Impact Assessment (PIA) report is submitted to SAHRA for commenting.

The HIA addendum recommendations were:

Beater, J. August 2019. Addendum to Phase 1 Heritage Impact Assessment Mulalo Main Transmission



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Substation and Associated Power Lines Project, Secunda, Mpumalanga Province.

The author recommends that Substation alternative B is chosen as the preferred site. A specialised walk down survey of the power line footings must be undertaken by a suitably qualified palaeontologist and a suitably qualified archaeologist.

In the Addendum report, the author assesses the potential impacts of substation alternative C as it the preferred site due to engineering constraints that prevents alternative B becoming the preferred alternative.

The author recommends the following:

- The graves must not be relocated, they must be retained *in situ* and the substation footprint relocated 200m away from its current proposed location to accommodate the conservation of the graves where they are.
- The construction team must be made aware of the types of heritage resources that are located close to the development and those that may be uncovered during construction.

A PIA report by Dr JF Durand was submitted on 05/12/2019 for commenting as per the 4/11/2019 Interim Comment.

Durand, J.F. November 2019. Proposed Mulalo 400/132KV Main Transmission Substation and associated integration of transmission and distribution power lines south of Secunda, Mpumalanga. Palaeontological Impact Assessment.

The study area is underlain mostly by shale and sandstone rocks of the Vryheid Formation, Ecca Group, Karoo Supergroup. The proposed substation sites C and B are underlain by dolerite, which has no palaeontological significance. However, the proposed loop in loop out power lines will be located in Very High palaeo-sensitive zones, and the shale and sandstone rocks of the Vryheid Formation may be impacted during the construction of the power lines. The author recommends the implementation of the fossil chance finds procedure located in the PIA report.

Final Comment

South African Heritage Resources Agency (SAHRA) Archaeology, Palaeontology and Meteorites (APM) Unit accepts the HIA addendum and the PIA report submitted to the case for commenting and has no objection to the development going ahead.



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The Chance Finds Fossil Procedure as detailed in the PIA must be included in the EMP, and

The graves must not be relocated, they must be retained *in situ* and the substation footprint relocated 200m away from its current proposed location to accommodate the conservation of the graves where they are.

The construction team must be made aware of the types of heritage resources that are located close to the development and those that may be uncovered during construction.

The following additional conditions must be included in the EMP:

If any historical buildings will be impacted by the proposed development, then comment and permits in terms of section 34 must be sort from the Mpumalanga Heritage Resources Authority (MPHRA). Please contact Benjamin Moduka at bmoduka@mpg.gov.za or call the offices at 013 766 5196.

The Burial Grounds and Graves (BGG) Unit accepts the recommendations for the burial grounds identified in the HIA report and further recommends that Site CS1 must be fenced with an access gate if there is no fence around the site. Before fencing may occur, permission from the family members must be sort. This must be done by undertaking a social consultation process to identify the family members of the site. This must be done in terms of Chapter IX of the NHRA Regulations and section 36(3) of the NHRA.

In the unlikely event that fossils are uncovered during construction then construction must cease within the immediate vicinity, a buffer of 30 m must be established, and a palaeontologist called in to inspect the finds. The palaeontologist must obtain a section 35(4) permit in terms of NHRA and Chapter IV NHRA Regulations, before any fossils are collected.

If there are any new heritages resources are discovered during construction and operation phases of the proposed development, then a professional archaeologist or palaeontologist, depending on the nature of the finds, must be contracted as soon as possible to inspect the findings at the expense of the developer.

If the newly discovered heritage resources prove to be of archaeological or palaeontological significance, a Phase 2 rescue operation may be required at the expense of the developer. Mitigation will only be carried out after the archaeologist or palaeontologist obtains a permit in terms of section 35 of the NHRA (Act 25 of 1999). You may contact SAHRA APM Unit for further details: (Nokukhanya Khumalo/Phillip Hine 021 202 8654).

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If any unmarked human burials are uncovered and the archaeologist called in to inspect the finds and/or the police find them to be heritage graves, then mitigation may be necessary and the SAHRA Burial Grounds and Graves (BGG) Unit must be contacted for processes to follow (Thingahangwi Tshivase/Mimi Seetelo 072 802 1251).

The Final EIA report appendices must be submitted to the case and once a Record of Decision from the competent authority is issued, it must also be submitted to the case. This comment must be forwarded to the competent authority and proof of submission must be uploaded to the case.

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

Yours faithfully

Nokukhanya Khumalo
Heritage Officer
South African Heritage Resources Agency

Phillip Hine
Manager: Archaeology, Palaeontology and Meteorites Unit
South African Heritage Resources Agency

ADMIN:

Direct URL to case: <http://www.sahra.org.za/node/528066>

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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.