

Our Ref:



an agency of the
Department of Arts and Culture

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South African Heritage Resources Agency | 111 Harrington Street | Cape Town
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CaseID: 9356

Date: Wednesday November 04, 2020

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Final Decision

In terms of Section 36(3) of the National Heritage Resources Act (Act 25 of 1999)

Attention: Mr Johan Nel

The Heritage Foundation
the Heritage Foundation
Monument Hill
Eufees Road
Groenkloof
Pretoria
0027

Exxaro submitted a MRA for the Belfast Project in accordance with requirements contained in the MPRDA. The DMR awarded a mining right for the Belfast Project in 2015. Exxaro also applied for Environmental Authorisation in terms of the NEMA to the MDEDET, who granted authorisation on 4 July 2013. the development of the Belfast Project will affect 32 households and around 200 graves. Currently only 160 graves will be impacted upon by mining activities relocation is the only viable option.

Exxaro Coal Mpumalanga (Pty) Ltd (hereinafter Exxaro) appointed Digby Wells Environmental (hereinafter Digby Wells) to undertake a Grave Relocation Process (GRP) in 2015, as required by their Belfast Implementation Project (BIP). Subsequent to the conclusion of the BIP GRP, Exxaro identified a previously unrecorded grave during operational activities at the Belfast Coal Mine, near Belfast in the Mpumalanga Province

A gravesite inspection was conducted on 17 August 2020 by a Heritage specialist and mine representative. The purpose of the inspection was to demonstrate compliance with the BIP EMP requirements and allow the heritage specialist the opportunity confirm the status quo, determine immediate remedial action to safeguard the burial ground from potential impacts, and make feasible recommendations as to the required management or mitigation measures.

Ntutuka T, **Belfast Coal Mine Grave Inspection (EXX6685)**, 23 Septembr 2020.

The identified grave was recorded through GPS waypoints and photographs. Digby Wells did not employ any Ground Penetrating Radar (GPR) technology or intrusive methodologies.

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Surface Dressing comprised traditional stone packed covering, and no headstone was present. As such, the age of the grave is unknown and assumed to be older than 60 years, afforded general protection in terms of Section 36 of the NHRA.

Findings and recommendations by the Heritage Specialist:

- The grave remain undisturbed and not impacted through operational activities.
- Immediate remedial action recommended to Exxaro was the establishment of a minimum 15 meter buffer around the grave, clear demarcation must be established to deter accidental damage, and signage be placed to increase visibility of the heritage resource.
- In situ conservation with a Conservation Management Plan (CMP) was recommended.

Final Decision

SAHRA Burial Grounds and Graves unit (BGG) acknowledges receipt of the submitted inspection report. However, we reject the in-situ conservation recommended by the Heritage Specialist for the following reasons:

1. The proposed 15 m buffer-zone is unreasonably less than the required 100m for mining operations.
2. In-situ preservation cannot be authorized with such high potential for the grave to be damaged.

As it is seemingly impossible to meet the required 100m buffer-zone, it is recommended that Grave-Exhumation and relocation Process which includes a FULL 60 days public consultation be initiated for the grave to be exhumed and relocated to a local municipal cemetery specified during consultations.

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Please let us know when an exhumation application is lodged.

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

Yours faithfully

Thingahangwi Tracy Tshivhase
Heritage Officer: Permitting
South African Heritage Resources Agency

Mimi Seetelo
Manager: Burial Grounds & Graves Unit
South African Heritage Resources Agency

ADMIN:

Direct URL to case: <http://www.sahra.org.za/node/361098>

(DMR, Ref: MP 30/5/1/2/2/431) (MDEDET, Ref: NEAS REF No. MPP/EIA/0000304/2012)

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.