



an agency of the
Department of Arts and Culture

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South African Heritage Resources Agency | 111 Harrington Street | Cape Town
P.O. Box 4637 | Cape Town | 8001
www.sahra.org.za

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CaseID: 13311

Date: Monday February 04, 2019
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Final Comment

In terms of Section 38(8) of the National Heritage Resources Act (Act 25 of 1999)

Attention: Eskom Holdings SOC Ltd

P.O. Box 8610
Johannesburg
200

A conceptual wetland offset strategy for the Kendal 30-year ADF Project in the Mpumalanga Province. The broad objectives of this report are: 1. To quantify the required wetland offset targets as per the requirements of the SANBI & DWS (2016) guidelines; 2. To identify and assess suitable target wetlands for implementation of the offset; 3. To identify rehabilitation opportunities within the selected target wetlands and develop conceptual rehabilitation and management interventions to address these; and 4. To compile a conceptual wetland offset strategy report for submission to the authorities.

Zithole Consulting has been appointed by Eskom Holdings SOC Ltd, to develop a Wetland Offset Strategy for the proposed Kendal 30-year Ash Disposal Facility (ADF), in the eMalahleni Local Municipality, Mpumalanga Province. The Department of Environmental Affairs (DEA) rejected the Final Environmental Impact Assessment Report (FEIAR), with the requirement that an amended Wetland Offset Strategy be submitted. The Amended Wetland Offset Strategy Report notes the following activities to be completed in order to enact the strategy: earth berm removal, removal of water impoundments near road crossings, reshaping and vegetating channeled wetlands, constructing weirs, rerouting farm roads and fill in trenches. The extent of the offset area is 927 ha and the rehabilitation will be conducted in 3 phases.

Should the Environmental Authorisation (EA) be granted for the proposed Kendal 30-year ADF, the Wetland Offset Strategy will be implemented as a condition of the EA.

The EA application for the proposed Kendal 30-year ADF was commented on by SAHRA on 20 September 2016 (SAHRIS Case ID 2574), whereby SAHRA did not state any objections to the proposed development with the following conditions:

A letter of appointment for the palaeontologist must be submitted to the case in the case private field. The letter must also indicate the days in which he/she will be on site for monitoring.



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The graves must be mitigated in terms of section 36 of the NHRA as mentioned in the recommendations of the report.

Comment on site KAD 15 the farmstead must be obtained from the MPHRA. Please contact Mr Ben Moduka at bmoduka@mpg.gov.za and 013 766 5196.

Final Comment

As the scope of activities for the proposed Kendal 30-year ADF has increased as a result of the Amended Wetland Offset Strategy, there are areas that will be impacted that were not covered by the Heritage Impact Assessment (HIA) and Palaeontological Impact Assessment (PIA) conducted as part of the EA process. Therefore, SAHRA Archaeology, Palaeontology and Meteorites (APM) Unit cannot state if there are objections to the proposed Wetland Offset Strategy, however requests that the following additional conditions must be adhered to as part of the Wetland Offset Strategy implementation plan, should the EA be granted:

- A field-based survey must be conducted of the proposed construction activity areas as outlined in Table 9 of the September 2018 Conceptual Wetland Offset Strategy report including any area that the draining of wetland water will be diverted to or areas to be flooded;
- The above survey must be conducted by a qualified archaeologist and palaeontologist. A report detailing the results of the survey and the assessment of the impact of the activities on identified heritage must be submitted to SAHRA for comment prior to any construction activities that may impact identified heritage resources. No activities may commence without comments from SAHRA in this regard;
- Should it not be possible to avoid impacting identified heritage resources, permits for mitigation of impacts must be applied for in terms of the relevant sections of the National Heritage Resources Act, no 25 of 1999 (NHRA). No mitigation measures may be implemented without permits issued by the relevant heritage authority in this regard;
- If any evidence of archaeological sites or remains (e.g., remnants of stone-made structures, indigenous ceramics, bones, stone artefacts, ostrich eggshell fragments and charcoal/ash concentrations), fossils or other categories of heritage resources are found during the proposed activities, a professional archaeologist or palaeontologist, depending on the nature of the finds, must be contacted as soon as possible to inspect the findings.
If the newly discovered heritage resources prove to be of archaeological or palaeontological

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significance a Phase 2 rescue operation might be necessary, and a permit will be needed before mitigation. You may contact SAHRA APM Unit for further details: (Nokukhanya Khumalo/Phillip Hine 021 202 8652),

- and if any unmarked human burials are uncovered then please contact the SAHRA BGG Unit (Mimi Seetelo 012 320 8490).

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

ADMIN:

Direct URL to case: <http://www.sahra.org.za/node/519396>
(DEA, Ref: 14/1216/3/3/3/68)

Terms & Conditions:

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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.