



## Final Comment

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

Attention: Eskom Holdings SOC Limited  
92 Hans Van Rensburg Street  
Polokwane  
0699

### PROPOSED EXTENSION OF THE ASH DISPOSAL FACILITIES AT CAMDEN POWER STATION.

*Gaigher, S. (December 2011). First Phase Heritage Impact Assessment for the Proposed Extension to the Camden Ash Disposal Facilities*

The above heritage report refers;

Eskom proposes to extend existing ash disposal facilities and associated infrastructure at the Camden Power Station situated approximately 12km from Ermelo. This extension will likely cover 100ha, with an additional 20ha of ash water return dams, channels, roads and fences.

All three proposed alternatives were assessed in the HIA. The submitted report indicates that only Alternative 2 has heritage concerns as a small graveyard was identified in the footprint of this alternative. No other heritage concerns were identified in the submitted report.

However, SAHRA has a number of concerns regarding the content of the submitted HIA. The report only contained two photographs, neither of which are clear. No GPS track paths were provided. In the introduction to the report, Section 27(1) of the NHRA (Act 25 of 1999) is quoted as the relevant piece of legislation for this submission. This is incorrect. Applications of this nature are submitted in terms of Section 38(8) of the NHRA (Act 25 of 1999). As such, the submitted report does not satisfy the Minimum Standards for Archaeological Impact Assessments approved by SAHRA in 2008.

### Final Comment

While the submitted report does not satisfy SAHRA's Minimum Standards for Archaeological Impact Assessments, the proposed development is unlikely to change the character of the proposed site alternatives and, as long as the conditions below are met, SAHRA has no objection to the proposed development. It should be noted, however, that reports completed after September 2012 that do not satisfy SAHRA's Minimum Standards will be rejected.

SAHRA supports Alternative 1 and Alternative 3 of the proposed development based on the information contained in the submitted report. SAHRA does not support Alternative 2 due to the impact development in this area will have on the identified graveyard.

The graveyard identified in the report as CAD001 must remain *in situ* and may not be impacted by the proposed development. A conservation management plan must be drafted to co-ordinate the ongoing



## Camden Ash Disposal Facilities Project

Our Ref: 9/2/222/0002

Enquiries: Jenna Lavin  
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CaseID: 1674

Date: Monday March 18, 2013

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management and conservation of the graveyard at CAD001.

Should it not be possible to adhere to the above conditions, the applicant must consult with SAHRA regarding the reasons for non-compliance. In this instance, on SAHRA's advice, other mitigation strategies may have to be adopted which will require following a process for archaeological investigation in terms of Section 35 and for exhumation in terms of Section 36 of the NHRA (Act 25 of 1999).

Should any evidence of archaeological sites or remains (e.g., remnants of stone-made structures, indigenous ceramics, bones, stone artefacts, ostrich eggshell fragments, charcoal/ash concentrations), unmarked human burials, fossils or other categories of heritage resources are found during the proposed activities, SAHRA APM Unit (Jenna Lavin/Colette Scheermeyer 021 462 4502) must be alerted immediately, and 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 significance a Phase 2 rescue operation might be necessary.

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

Yours faithfully

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Jenna Lavin  
Heritage Officer  
South African Heritage Resources Agency

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Colette Scheermeyer  
SAHRA Head Archaeologist  
South African Heritage Resources Agency

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**ADMIN:**  
(DEA, Ref: 12/12/20/2300)

Terms & Conditions:



The South African Heritage Resources Agency

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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.



The South African Heritage Resources Agency

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