



Interim 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

Draft Scoping Report: Application for a proposed Ash Dump associated with the existing Kusile Coal-Fired Power Station in Mpumalanga.

Van Schalkwyk, J. (October 2006). Heritage Impact Assessment for the Proposed New Power Station, Witbank Area

Murimbika, M. (September 2012). Heritage Mitigation Report for the Excavation of suspected Human Burials identified accidentally during Construction Work at Kusile Power Station in Emalahleni Local Municipality in Mpumalanga Province.

The above studies were submitted at the heritage component for the Draft Scoping Report for the proposed new ash disposal facility at the existing Kusile Coal-fired Power Station and assessed the impacts of the development of the Kusile Power Station at two proposed sites; Site X and Site Y. Environmental Authorisation was granted for the Kusile Power Station in 2008, this EA included a proposed ash dump. Subsequently, the specifications of the proposed ash dump have changed, and consequently a new process is required for the proposed ash dump.

According to the Draft Scoping Report (2013), the Kusile Power Station is underlain by the Dwyka and Ecca Formations of the Karoo Supergroup. These formations are renowned for their palaeontological resources however no assessment of the impact of the proposed development to these resources has been submitted to SAHRA.

The submitted HIA identified a number of heritage resources that were likely to be impacted by the construction of the Kusile Coal-fired Power Station. These included 5 structures of variable significance that fell within the development area (both sites X and Y) as well as a total of 21 grave/cemetery sites were identified during the field survey, two of which are likely to fall just outside of the boundaries of the Sites X and Y. Of the remaining 19 sites, eight sites definitely contained graves that are 60 years or older. The graves at the remaining sites are either less than 60 years old, or do not have headstones, making their age indeterminable. The recommendations included in the HIA (2006) required that the identified resources be preserved and not impacted by the proposed development. Based on this information, Site X was preferred.





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During site clearance associated with the original ash dump development, possible burials in the form of stone cairns were identified. These were excavated, with the necessary permissions in place, however no physical remains were recovered.

No indication has been provided at which site (X or Y) was selected for the development of the Kusile Power Station. According to the Final EIA provided to SAHRA, a second heritage study was completed. This has not been submitted to SAHRA. No indication has been provided as to what heritage resources may be impacted by the development of the new proposed ash dump.

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In order for SAHRA to make an informed comment on the proposed development, additional information is required. As such, please provide the following information;

1. The revised HIA included at Annexure W in the Final EIA for the Kusile Power Station 9 (page 118)
2. An indication of what heritage resources were impacted by the development of the Kusile Power Station and how these impacts were mitigated.
3. A Palaeontological Impact Assessment or a letter of exemption from conducting a palaeontological study from a palaeontologist
4. An indication of what heritage resources, in any, will be impacted by the proposed development including a map of the layout of the proposed ash dump in relation to the heritage resources identified in the 2006 HIA as well as in relation to the existing Kusile Power Station.

Please can you ensure that SAHRA receives the relevant documentation such that SAHRA can issue a Final Comment on this application.

Should it not be possible to adhere to the above conditions, the applicant must consult with SAHRA regarding the reasons for non-compliance. We look forward to hearing from you.

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

Yours faithfully

Jenna Lavin



Kusile Power Station Ash Dump

Our Ref: 16/1/5/5 Eskom Kusile Coal Fired Power Station

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Heritage Officer
South African Heritage Resources Agency

Colette Scheermeyer
SAHRA Head Archaeologist
South African Heritage Resources Agency

ADMIN:

Direct URL to case: <http://www.sahra.org.za/node/117255>
(DEA, Ref: 14/12/16/3/3/3/51)



The South African Heritage Resources Agency

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