



Final Comment

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

Attention: JMA Consulting
PO Box 883
DELMAS
2210

Application for the exhumation & relocation of unknown graves/graves older than 60 years from Zandfontein 130IS & Grootspuit 279IS, near Secunda, Mpumalanga. Sasol Mining development of Shandoni Shaft and conveyor

Rubidge, B. (March 2013). Palaeontological Desktop Study: Sasol Shondoni Conveyor Amendment Project Secunda, Mpumalanga Province

Pistorius, J. (February 2013). A (2nd Revised) Phase 1 Heritage Impact Assessment (HIA) for the Sasol Shondoni Conveyor Amendment Project on the Eastern Highveld, Mpumalanga.

The application is for an amendment of the route proposed for the conveyor belt that is intended to transport coal from the new Shondoni Man and Material Shaft to the Sasol Coal Supply centre. The original proposed conveyor route was determined to be an environmental risk as it crossed the Waterval River and Wetland system. As such, three alternative routes were investigated; a Western Route, a Central Route and a South-Eastern Route. The Western Route Alternative will impact on three graveyards (44 graves), the Central Route Alternative will impact on 1 graveyard (13 graves) and the South-Eastern Route Alternative will impact on one graveyard (hundreds of graves). The Central Route Alternative was removed as an option due to the noise impact on urban areas in the vicinity. Two feasibility studies identified the Western Route as the preferred alternative. As such, this heritage assessment focused on the heritage impacts of the Western Route.

According to the submitted palaeontological assessment, the project area is underlain by the rocks of the Karoo Supergroup comprising sedimentary rocks of the Permian Vryheid Formation of the Ecca Group as well as Jurassic Karoo dolerites. The Jurassic dolerites are not fossiliferous, however the Vryheid Formation is renowned for its wealth of plant fossils. Quarternary alluvial deposits are present along the banks of watercourses however, these are unlikely to contain fossils.

Should construction activities expose extensive mudrocks of the Vryheid Formation, this will provide a unique opportunity for palaeontologists to explore the area for fossil heritage.

Comment

SAHRA accepts the above Second Revised HIA as satisfactorily assessing the impacts of the proposed development to archaeological resources, the historical built environment as well as to burial grounds and graves. The identified historical remains in the form of dilapidated houses and cattle enclosures have been sufficiently recorded. SAHRA accepts the above submitted palaeontological assessment as adequately





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assessing the likely impacts of the proposed development to palaeontological heritage resources.

In terms of the recommendation included in the HIA previously submitted as well as this desktop palaeontological assessment, SAHRA has no objection to the proposed development and requires that;

1. The graves indicated in the HIA (February 2013) to be directly impacted by the proposed development (GY01, GY04 and GY05) should be exhumed and relocated. A permit in terms of Section 36 of NHRA (Act 25 of 1999) must be applied for.
2. The graves indicated in the HIA (February 2013) to be indirectly impacted by the proposed development (GY02 and GY03) must be fenced off and a buffer zone of 15m must be implemented around these graves. A Conservation Management Plan must be developed for the ongoing protection of these graves and this must be included in the EMP for the proposed development.

It must be noted that should any of the structures identified in the report require alteration or demolition, a permit must first be granted for this work by the Mpumalanga Provincial Heritage Resources Authority (Mr B. Moduka: bmoduka@mpg.gov.za or 013 766 5198) in terms of Section 34 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 be 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 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 or palaeontological investigation in terms of Section 35 and for exhumation in terms of Section 36 of the NHRA (Act 25 of 1999).

SAHRA requires that the above conditions be included in the Final EMP. As long as this is done, SAHRA will not appeal the environmental authorisation already granted by MDEDET on 30 January 2013.

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

Yours faithfully



Sasol Secunda Graves Exhumation

Our Ref: BGG

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CaseID: 1095

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South African Heritage Resources Agency



Colette Scheermeyer
SAHRA Head Archaeologist
South African Heritage Resources Agency

ADMIN:

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.



The South African Heritage Resources Agency

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