



Final Comment

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

Attention: Mr Henri Nieuwoudt
Anglo American Inyosi Coal (Pty) Ltd (AAIC)
PO Box 61587
Marshalltown
Johannesburg
2017

PHOLA KUSILE OVERLAND COAL CONVEYOR : ENVIRONMENTAL IMPACT ASSESSMENT REPORT

VAN SCHALKWYK, J. 2011. HERITAGE IMPACT ASSESSMENT FOR THE PROPOSED PHOLA-KUSILE COAL CONVEYOR, NKANGALA DISTRICT MUNICIPALITY, MPUMALANGA PROVINCE

Anglo American Inyosi Coal (Pty) Ltd (AAIC) is proposing to construct an overland conveyor system, the Phola-Kusile Overland Coal Conveyor, to transport coal from the Phola Coal Processing Plant (Phola CPP) to Eskom's Kusile Power Station (Kusile) in the Mpumalanga Province. The conveyor will be approximately 20km, with a servitude of 30 meters, a service road and a 22Kv power line and a storm water management system along the conveyor belt. Three route alternatives were assessed during the Scoping Phase of which two were eliminated. According to the EIA Report the preferred route will have the least impact on wetlands and streams.

The specialist indicated that all three route alternatives were surveyed by foot and vehicle. However, the report does not specify which route is preferred from a heritage point of view. A map on page 9 of the specialist report plots a number of cemeteries in the broader landscape, but only those that fall within the 200m buffer zone of the conveyor are mentioned. It is not clear if the other cemeteries identified on the map were found as part of this project or during background research for the project. There are seven cemeteries identified as Graveyard 1-7 that fall within the 200m buffer zone but it is not clear which of these might actually be affected by the conveyor and its associated infrastructure. It is not clear how many graves are actually present in each graveyard, whether the graves are older or younger than 60 years and whether they are in a good state of preservation and still visited. Moreover, no images of any of these burial grounds are provided.

Considering the number of the cemeteries recorded in the area it is surprising that no farmsteads or homesteads have been identified.

There are also a number of archaeological sites plotted on the map but never described in the report. It would have been ideal if the heritage sites were plotted in relation to all three route alternatives.

Decision:

Considering the number of graves that were identified in the area, SAHRA APM Unit requests that a more detailed report regarding the graves and the impact that the chosen route will have on them be submitted to SAHRA for further comments.





Enquiries: Phillip Hine
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It is highly recommended that, if possible, cemeteries and individual graves must be avoided and incorporated into the development. A proper fence and an access gate to allow visits from relatives and friends must be erected around them and no development is allowed within 20m from the fence. If it is not possible to retain the cemeteries, relocation may proceed dependant on the result of the mandatory 60 day public participation process and a permit in terms of section 36 of the NHRA (Act no. 25 of 1999) will be needed. These recommendations are applicable to graves of 60 years or older.

The Environmental Control Officer and all the construction crew must be inducted in the range of heritage resources that could be present especially stone walling and graves associated with Early Farmer communities.

No palaeontological assessment was conducted for this project, therefore a palaeontological impact assessment must be undertaken before developments may proceed. If the professional palaeontologist deems it sufficient, a Letter of Exemption from undertaking further studies may be compiled.

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

Yours faithfully

Phillip Hine
Heritage Officer

Colette Scheermeyer
SAHRA Head Archaeologist
South African Heritage Resources Agency

ADMIN:
(MDEDET, Ref: 17/2/3 N-13)

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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