Sasol Secunda Graves Exhumation

Our Ref: BGG

Enquiries: Jenna Lavin Tel: 021 462 4502

Email: jlavin@sahra.org.za

CaseID: 1095



Date: Wednesday February 27, 2013

Page No: 1

Interim 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 & Grootspruit 279IS, near Secunda, Mpumalanga. Sasol Mining development of Shandoni Shaft and conveyor

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 above Second Revised HIA was submitted in response to the letter from SAHRA dated 19 February 2013. This report has satisfied a number of the concerns raised by SAHRA regarding the previously submitted reports.

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 focussed on the heritage impacts of the Western Route.

An initial survey was undertaken in which the total length of the survey corridor was traversed by car. Two subsequent surveys were done during which selected areas were inspected on foot. No GPS track paths were recorded. Most heritage resources were identified in the central part of the conveyor route.

A number of historical remains consisting of dilapidated houses and cattle enclosures were identified. These were all identified as having low significance as they are common across the Eastern Highveld and have no research or educational significance. These remains have been adequately recorded.

Five graveyards were identified in the vicinity of the Western Route Alternative.

GY01 consists of approximately 22 individuals and will be directly impacted by the proposed development. GY02 consists of approximately 7 individuals and will be indirectly impacted by the proposed development. GY03 consists of approximately 6 vandalised graves and will be indirectly impacted by the proposed development.



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Page No: 2



GY04 consists of approximately 9 individuals and will be directly impacted by the proposed development. GY05 consists of approximately 13 individuals and will be directly impacted by the proposed development.

These graves have been identified as having high significance, however due to the general circumstances of undeclared graves in the region, these graves are vandalised, abandoned and unprotected.

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.

However, a **Palaeontological Impact Assessment**, as requested in our previous letters dated 8 and 19 February 2013, **is still outstanding.**

In terms of the recommendation included in the above HIA, SAHRA requires that;

- 1. A Palaeontological Impact Assessment be submitted
- 2. The graves 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.
- 3. The graves 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.

SAHRA will await the submission of the outstanding Palaeontological Impact Assessment before issuing a Final Comment for this proposed development.

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 Heritage Officer

South African Heritage Resources Agency



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Page No: 3



Calatta Sahaarmayar

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.

