



Letter

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

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

The above Revised HIA was submitted in response to the letter from SAHRA dated 8 February 2013. Unfortunately, the above Revised HIA has not adequately dealt with a number of the issues raised in our previous letter.

The submitted HIA does not provide sufficient information regarding the development proposal and the infrastructure required.

- No assessment of development alternatives, required in terms of NEMA (Act 107 of 1998), was provided in terms of the impact to heritage resources.
- No assessment of impact to palaeontological resources has been provided.
- There is no evidence in either HIA that the entire Conveyor Route was surveyed.
- The historical remains should have been inspected during the HIA process, it is unclear why another archaeologist should go back and assess these heritage resources if they are going to be impacted. At the Phase 1 stage of the HIA, these archaeological resources should at least be mapped and recorded.
- The assessment of significance of the identified heritage resources provided in the submitted HIA is unclear and has not been substantiated. As such, sufficient motivation for the proposed mitigation measures has not been provided.

In addition, the above Revised HIA does not comply with the SAHRA Minimum Standards for undertaking Archaeological Impact Assessments.

SAHRA has managed to gain some clarity regarding the proposed development from Section 4.8.9.4.1 of the Final EIR for the Sasol Mining Middelbult - Block 8 - Shandoni Project, however some vital details are not provided.





The Appendix in which the alternatives for the route of the conveyor belt were assessed has not been submitted (Appendix 4.9A)

- A clear description of the width of the servitude for the conveyor belt route has not been provided
- A clear description of the type of infrastructure proposed for the conveyor belt including depth of foundations etc has not been provided
- A motivation as to why the identified graveyards (GY 01, GY 04 and GY 05) cannot be avoided by the conveyor belt alignment has not been provided.
- The proximity of the development to the graveyards has also not been explained in the report.
- The identified number of graves reported in the assessment dated February 2013 is not consistent with surveys undertaken by other archaeologists in the area. This discrepancy should be explained.

Please note that the statement: (...) *prior to their investigation by an archaeologist accredited with the South African Heritage Resources Agency (SAHRA)* is incorrect since SAHRA does not accredit archaeologists. This sentence should therefore be modified.

SAHRA is unable to provide a final comment on the impacts of the Sasol Shondoni Conveyor Amendment Project to heritage resources until the above queries have been adequately responded to.

A response to the above queries is required in order for this project to comply with the requirements of Section 38(8) of the National Heritage Resources Act (Act 25 of 1999).

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



Sasol Secunda Graves Exhumation

Our Ref: BGG

Enquiries: Jenna Lavin
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Email: jlavin@sahra.org.za
CaseID: 1095

Date: Tuesday February 19, 2013

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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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