



<b>To:</b>	Thembisa Ntutuka	<b>Date:</b>	23 September 2020
<b>From:</b>	Digby Wells Environmental	<b>Proj #:</b>	EXX6685
<b>RE:</b>	<b>Belfast Coal Mine Grave Inspection</b>		

## 1. Introduction

Exxaro Coal Mpumalanga (Pty) Ltd (hereinafter Exxaro) appointed Digby Wells Environmental (hereinafter Digby Wells) to undertake a Grave Relocation Process (GRP) in 2015, as required by their Belfast Implementation Project (BIP).

Subsequent to the conclusion of the BIP GRP, Exxaro identified a previously unrecorded grave during operational activities at the Belfast Coal Mine, near Belfast in the Mpumalanga Province.

This document serves as a Site Inspection Report (SIR), detailing the results of the site inspection to comply with the requirements encapsulated in the approved Environmental Management Plan (EMP).

### 1.1. Project Background

Exxaro is the holder of a Mining Right (MP 30/5/1/2/2/431) for the Belfast Coal Mine, presently operational. The Mpumalanga Department of Economic Development, Environment and Tourism (MDEDET) granted Environmental Authorisation (EA [MDEDET Ref. No.: 17/2/3 N-131; NEAS Ref. No.: MPP/EIA/0000304/2012]) for the Project on 4 July 2013, after which Exxaro appointed Digby Wells to develop a Resettlement Action Plan (RAP) and undertake a Burial Grounds and Graves Consultation (BGGC) Process.

The BGGC Process aimed to identify and consult with *bona fide* Next-of-Kin (NoK) of deceased buried in affected graves regarding the future of identified graves, with specific focus on possible grave relocation. The outcomes of this process were encapsulated within the BGGC Report in support of an application for exhumation and relocation to the various national and provincial authorities. On behalf of Exxaro, Digby Wells made the following applications:

- The SAHRA BGG Unit in terms of Section 36 of the National Heritage Resources Act, 1999 (Act No. 25 of 1999) (NHRA); and
- The Mpumalanga Department of Health and Emakhazeni Local Municipality (ELM) in terms of the National Health Act, 2003 (Act No. 61 of 2003) (NHA) and The Mpumalanga Cemeteries, Crematoria and Exhumation of Bodies Act, 2005 (Act No. 8 of 2005) (MCCEBA).

Following the receipt of the relevant permits and approvals, Exxaro requested Digby Wells in conjunction with the Mosaic Funeral Group (MFG) Emakhazeni (hereinafter MFG) to implement the GRP. The BIP GRP concluded in October 2019 with the submission of the final Report to satisfy the conditions of the Section 36 Permit (Permit ID 2960).

**Table 1: SAHRIS References**

<b>Case Reference:</b>	Exxaro Belfast GRP			
<b>SAHRA Case ID:</b>	9356			
<b>Case Officer:</b>	Thingahangwi Tracy Tshivhase			
<b>Permit ID:</b>	2244	2561	2719	2960
<b>Permit Validity:</b>	May 2016 – May 2017	July 2017 – July 2018	April 2018 – April 2019	June 2019 – June 2020
<b>Permit Holders:</b>	Johan Nel and Justin du Piesanie			

Subsequent to the conclusion of the BIP GRP, Exxaro identified a suspected grave in proximity to their Pit 1 Strip 17 Block 1/2 infrastructure footprint. To comply with Section 15.2<sup>1</sup> of the BIP EMP, Exxaro immediately reported the discovery to and appointed Digby Wells as the specialist service provider.

## 1.2. Project Location

The Project is situated approximately 10 km southwest of Belfast, 45 km east of Middelburg and 30 km north of Carolina within the Mpumalanga Province. Exxaro is the current legal landowner of the properties on which the Belfast Coal Mine is developed, and the various burial grounds and graves are located.

Plan 1 presents the local setting of the BIP operation, where Plan 2 demonstrates the location of the newly identified grave to that of the known graves considered during the BIP GRP.






General location details of the Belfast Coal Mine are presented in Table 1-2.

<sup>1</sup> Section 15.2.1 of the BIP EMP stipulates, “*Should any unknown human remains be disturbed, exposed or uncovered during construction and / or operational phase of the Project, these should be immediately reported to a registered archaeologist. Burial remains should not be disturbed or removed until inspected by an archaeologist*”.



# Belfast Mine Grave Inspection Geographical Setting of the Project

## Legend

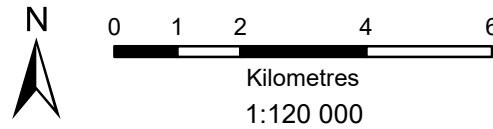
-  Project Boundary
-  Secondary Town
-  Settlement
-  Arterial / National Route
-  Main Road
-  Minor Road
-  Railway Line
-  Non-Perennial Stream
-  Perennial Stream
-  Dam Wall
-  Dam / Lake
-  Wetland
-  Perennial Pan
-  Non-Perennial Pan / Stream



DIGBY WELLS  
ENVIRONMENTAL

• Sustainability • Service • Positive Change • Professionalism • Future Focused • Integrity

Projection: Transverse Mercator	Ref #: EXX6685_02_AJM_v1
Datum: WGS 1984	Revision Number: 1
Central Meridian: 29°E	Date: 19/08/2020



Source: Esri, Maxar, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AeroGRID, IGN, and the GIS User Community



# Belfast Mine Grave Inspection BIP GRP Burial Grounds & Graves Distribution

## Legend

- Project Boundary
- Arterial / National Route
- Main Road
- Minor Road
- Railway Line
- Non-Perennial Stream
- Perennial Stream
- Dam / Lake
- Perennial Pan
- Non-Perennial Pan / Stream

## Distribution of BIP GRP Burial Grounds & Graves

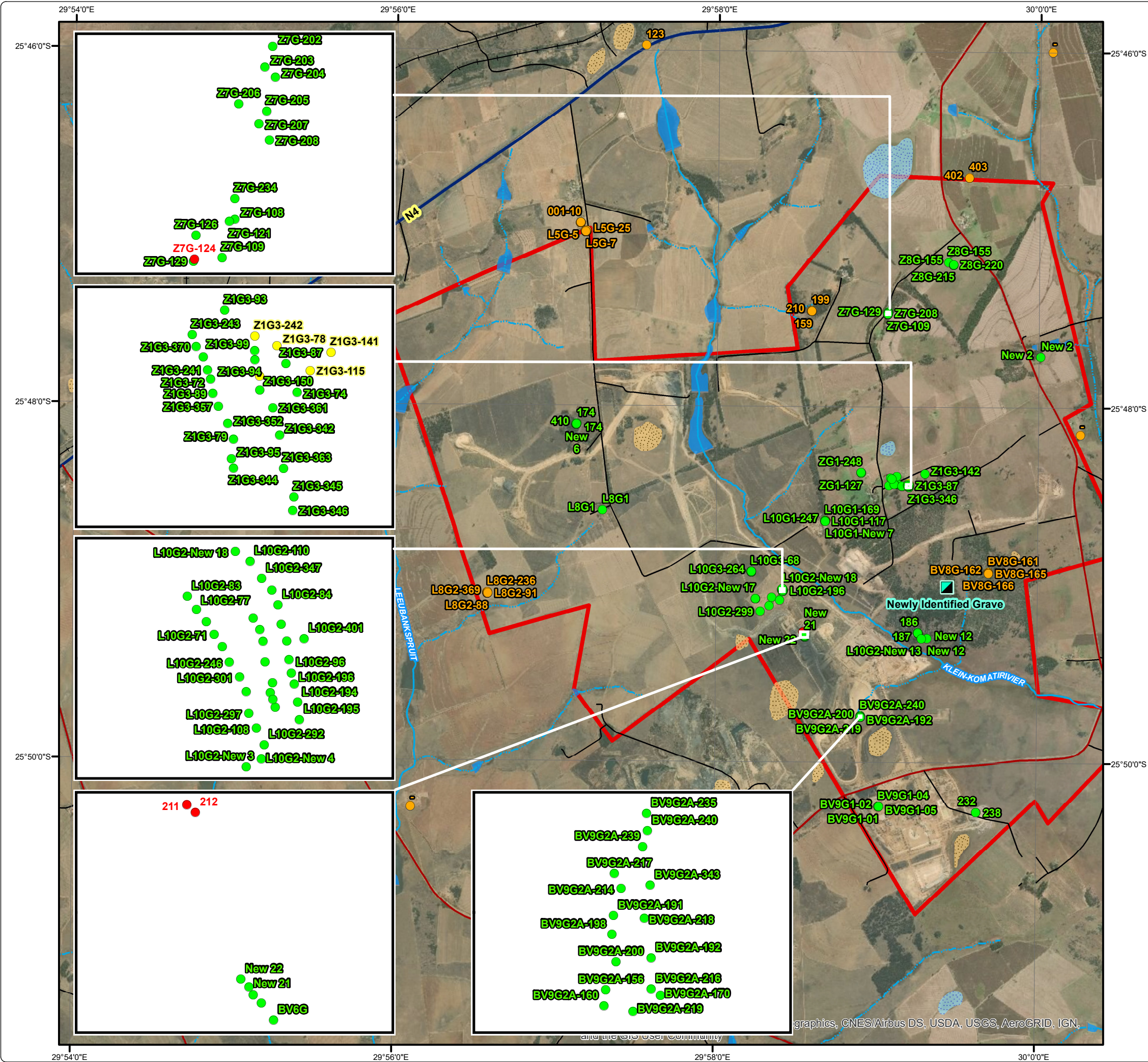
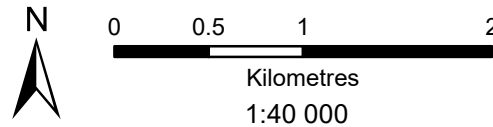
- Exhumed Graves
- Not Exhumed
- Conserved Graves
- To be Exhumed
- Newly Identified Grave



DIGBY WELLS  
ENVIRONMENTAL

• Sustainability • Service • Positive Change • Professionalism • Future Focused • Integrity

Projection: Transverse Mercator      Ref #: EXX6685\_AJM\_01\_v1  
Datum: WGS 1984      Revision Number: 1  
Central Meridian: 29°E      Date: 19/08/2020





**Table 1-2: Location Details of the Belfast Coal Mine**

<b>Geographical Location</b>	
<b>Province</b>	Mpumalanga
<b>District Municipality</b>	Nkangala District Municipality (NDM)
<b>Local Municipality</b>	ELM
<b>Magisterial District</b>	Belfast
<b>Nearest Town/s</b>	Belfast, Middelburg, Carolina
<b>Properties</b>	Blyvooruitzicht 383 JT Leeuwbank 427 JS Zoekop 426 JS
<b>Map reference/s</b>	2528 Pretoria & 2530 Nelspruit 1:250 000 topographical map sheets 2529 DD Arnot & 2530 CC Moedig 1:50 000 topographical map sheets
<b>Planning Authority</b>	
<b>Name</b>	Emakhazeni Local Municipality
<b>Address</b>	25 Scheepers Street, Belfast 1100
<b>Contact person</b>	Mr. T.C. Khoza
<b>Telephone</b>	013 253 1121
<b>Fax</b>	013 253 2440 / 013 253 1889
<b>Email</b>	<a href="mailto:khozat@emakhazenilm.co.za">khozat@emakhazenilm.co.za</a> / <a href="mailto:municipality@emakhazenilm.co.za">municipality@emakhazenilm.co.za</a>

### 1.3. Terms of Reference

To provide specialist heritage support regarding the newly-identified grave in proximity to the BIP Pit 1 Strip 17 Block 1/2 infrastructure footprint to comply with the requirements stipulated within the BIP EMP.

### 1.4. Scope of Work

In respect of this report, Digby Wells completed the following Scope of Work (SoW):

- On-site inspection of the finds by a qualified archaeologist;
- Compiled an SIR with recommended remedial actions; and
- Liaison with the SAHRA BGG Unit.

## 2. Expertise of the Specialist

Table 2-1 presents a summary of the expertise of the specialists involved in the compilation of this report.

**Table 2-1: Expertise of the specialists**

Team Member	Bio Sketch
<p><b>Shannon Hardwick</b></p> <p>ASAPA Member: 451</p> <p>ICOMOS Member 38048</p> <p>Years' Experience: 2</p>	<p>Shannon joined the Digby Wells team in May 2017 as a Heritage Management Intern and has most recently been appointed as a Heritage Resources Management Consultant. Shannon is an archaeologist who obtained a Master of Science (MSc) degree from the University of the Witwatersrand in 2013, specialising in historical archaeobotany in the Limpopo Province. She is a published co-author of one paper in <i>Journal of Ethnobiology</i>. Since joining Digby Wells, Shannon has gained generalist experience through the compilation of Notification of Intent to Develop (NID) applications as well as Heritage Scoping Reports (HSRs) and HIAs. Her other experience includes compiling a Community Health, Safety and Security Management Plan (CHSSMP) and researching Artisanal and Small-Scale Mining for input into a Livelihood Restoration Framework (LRF). Shannon's experience in the field includes pre-disturbance surveys in South Africa and fieldwork in Malawi.</p>
<p><b>Justin du Piesanie</b></p> <p>ASAPA Member 270</p> <p>ICOMOS Member 14274</p> <p>IAIAsa Member</p> <p>Years' Experience: 13</p>	<p>Justin is the Divisional Manager for Social and Heritage Services at Digby Wells. Justin joined the company in August 2011 as an archaeologist and was subsequently made HRM Manager and Divisional Manager in 2016 and 2018 respectively. He obtained his MSc degree in Archaeology from the University of the Witwatersrand in 2008, specialising in the Southern African Iron Age. Justin also attended courses in architectural and urban conservation through the University of Cape Town's Faculty of Engineering and the Built Environment Continuing Professional Development Programme in 2013. Justin is a professional member of the Association of Southern African Professional Archaeologists (ASAPA), and accredited by the association's Cultural Resources Management (CRM) section. He is also a member of the International Council on Monuments and Sites (ICOMOS), an advisory body to the UNESCO World Heritage Convention. He has over 12 years combined experience in HRM in South Africa, including heritage assessments, archaeological mitigation, grave relocation, NHRA Section 34 application processes, and Conservation Management Plans (CMPs). Justin has gained further generalist experience since his appointment at Digby Wells in Botswana, Burkina Faso, Cameroon, the Democratic Republic of Congo, Liberia, Malawi, Mali and Senegal on projects that have required compliance with IFC requirements such as Performance Standard 8: Cultural Heritage. Furthermore, Justin has acted as a technical expert reviewer of HRM projects undertaken in Cameroon, Malawi and Senegal. Justin's current focus at Digby Wells is to develop the HRM process as an integrated discipline following international HRM principles and standards. This approach aims to provide clients with comprehensive, project-specific solutions that promote ethical heritage management and assist in achieving strategic objectives.</p>

### 3. Results of the Site Inspection

Justin du Piesanie and Shannon Hardwick, in conjunction with Exxaro representatives, undertook an inspection of the grave on 17 August 2020. The purpose of this inspection was to demonstrate compliance with the BIP EMP requirements and allow the heritage practitioner

the opportunity confirm the status quo, determine immediate remedial action<sup>2</sup> to safeguard the burial ground from potential impacts, and make feasible recommendations as to the required management or mitigation measures.

The identified grave was recorded through GPS waypoints and photographs. Digby Wells did not employ any Ground Penetrating Radar (GPR) technology or intrusive methodologies. Surface Dressing comprised traditional stone packed covering, and no headstone was present. As such, the age of the grave is unknown and assumed to be older than 60 years, afforded general protection in terms of Section 36 of the NHRA.

### 3.1. Illustrative Material

The current status quo is demonstrated in Figure 3-1.



**Figure 3-1: Status Quo of Newly Identified Grave**

### 3.2. Statement of Cultural Significance

Cultural Significance (CS) is defined as the intrinsic aesthetic, architectural, historical, scientific, social, spiritual, linguistic or technological value of a cultural heritage resource. This section provides an abbreviated methodology to determine CS, a Significance Statement for the burial ground. These aspects are discussed separately below.

#### 3.2.1. Methodology

Digby Wells developed a CS Determination Methodology to assign numerical CS values to identified heritage resources in an objective way and in a manner that could be reproduced independently by another assessor using the same information, should it be required. The Digby Wells methodology combines the nine attributes above to form four themes: aesthetic, historical, scientific and social.

---

<sup>2</sup> It was recommended that the approximate extent of the burial ground be clearly demarcated and any works within the possible boundaries cease immediately.

The Digby Wells methodology determines the intrinsic, comparative and contextual significance of identified cultural heritage resources against the abovementioned criteria and themes. The result of these values is averaged to produce a numerical representation of a resource's importance. This importance rating is informed by a review of available credible sources and the uniqueness or representativity of the resource. The final CS value considers the physical integrity of the fabric of the resource.

Grading of heritage resources is the responsibility of Heritage Resource Authorities (HRAs). This notwithstanding, the SAHRA Minimum Standards require heritage assessments include Field Ratings for identified resources to comply with Section 38 of the NHRA. Section 7 of the NHRA provides for the system of grading heritage resources that form part of the national estate.

The CS value of a heritage resource directly relates to the sensitivity of a heritage resource to change (i.e. impacts) and determines the minimum accepted levels of change to the heritage resource (i.e. the mitigations required) in terms of the SAHRA Minimum Standards. The Field Ratings determine the management responsibilities required for the identified heritage resource (i.e. local, provincial or national) and guide any related decision-making processes.

### **3.2.2. Statement of Significance**

Table 3-1 presents the CS statement regarding the burial ground. This site is a heritage resource with Very High CS and a Grade I Field Rating<sup>3</sup>. Such heritage resources cultural significance is universally accepted.

As per the NHRA and SAHRA Minimum Standards, the minimum required mitigation requirements for heritage resources of this significance include:

- The Project design must change to avoid any change to these resources<sup>4</sup>;
- The heritage resource must be conserved *in situ*; and
- The heritage resource(s) must be included in a Heritage Site Management Plan (HSMP).

Project-specific recommendations are presented in Section 4 below.

---

<sup>3</sup> This grading denotes the proposed level of management that the heritage resource will require. Burial Grounds and Graves fall under the SAHRA BGG Unit's ambit, which is a national body.

<sup>4</sup> Should it not be possible to alter the Project design, Exxaro will be required to undertake a GRP. This is not anticipated based on Digby Wells' understanding of the Project where the grave is situated outside of the anticipated development footprint, within proximity to operational activities only.



**Table 3-1: CS and Field Ratings**

Resource ID	Description	Aesthetic	Historic	Scientific	Social	INTEGRITY	Designation	Recommended Field Rating	Management Level
Unknown Grave	Burial Ground & Graves	- Burial ground and graves were not assessed against aesthetic criteria as defined in Section 3(3) of the NHRA.	- Burial ground and graves were not assessed against historic criteria as defined in Section 3(3) of the NHRA.	- Burial ground and graves were not assessed against scientific criteria as defined in Section 3(3) of the NHRA.	5 Burial ground and graves have specific connections to communities or groups for spiritual reasons. The significance is universally accepted.	4 The integrity of the burial ground is considered to be excellent with both tangible and intangible fabric preserved.	Very High 20	Grade I	National

## 4. Recommendations and Way Forward

The current *status quo* of the grave is that it remains undisturbed and not impacted through operational activities.

Immediate remedial action recommended to Exxaro is the establishment of a minimum 15 meter buffer around the grave, clear demarcation must be established to deter accidental damage, and signage be placed to increase visibility of the heritage resource.

It is recommended, with the SAHRA approval and authorisation, the grave be conserved *in situ* and managed through a Conservation Management Plan (CMP). The CMP will serve as a procedural document and must aim to promote the continued *in-situ* conservation of the individual grave, detailing inter alia:

- The extent of the location and extent of the grave;
- Applicable management structure, roles and responsibilities;
- Required remedial actions to mitigate unplanned or manifested impacts;
- Identified current and future risks; and
- Required management measures to avoid or reduce the intensity of risks.

Should the Project-related activities at the BIP Pit 1 Strip 17 Block 1/2 infrastructure footprint preclude *in situ* conservation of the burial ground, Exxaro are required to complete a Permit Application Process. Given the extensive consultation previously undertaken as part of the BIP GRP, and the conclusion of the physical exhumations and relocations, it is assumed the newly identified grave is attributed to Category 1, i.e. no known Next-of-Kin. Furthermore, as all prescribed requirements in terms of Chapter IX and XI of the NHRA Regulations (GN R 528) were complied with as part to the BIP GRP, exemption from the full GRP process is requested and a recommendation for Rescue Permit Application is made.

This notwithstanding, it is not envisaged a GRP will be required with the development and implementation of a CMP.

## 5. Conclusion

Subsequent to the conclusion of the BIP GRP, Exxaro identified a suspected grave in proximity to their Pit 1 Strip 17 Block 1/2 infrastructure footprint. Justin du Piesanie and Shannon Hardwick, in conjunction with Exxaro representatives, undertook an inspection of the grave on 17 August 2020 to comply with the requirements encapsulated in the BIP EMP.

The current *status quo* of the grave is that it remains undisturbed and not impacted through operational activities. It is recommended, with the SAHRA approval and authorisation, the grave be conserved *in situ* and managed through a CMP. Should the Project-related activities at the BIP Pit 1 Strip 17 Block 1/2 infrastructure footprint preclude *in situ* conservation of the burial ground, Exxaro are required to complete a Permit Application Process taking into consideration the motivation presented in Section 4 above.



Where these recommendations are approved by the SAHRA and implemented by Exxaro, Digby Wells believes the grave can be conserved *in situ* with minimal future risk.

Regards,



Justin du Piesanie

*Divisional Manager: Social and Heritage Services*