



**SOUTH AFRICAN HERITAGE
RESOURCES AGENCY**

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DATE: 20 April 2009
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YOUR REF:
OUR REF: 9/2/240/0001

Limpopo Coal Company
PO Box 69517
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2021

Chantelle Will
Arcus Gibb
P.O. Box 2700
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Dear Sir/Madam,

**REQUEST FOR A HERITAGE IMPACT ASSESSMENT: MAPUNGUBWE CULTURAL
LANDSCAPE.**

Introduction

In earlier communications, the South African Heritage Resources Agency has expressed concern over the general industrialization proposed for the vicinity of the Mapungubwe Cultural Landscape, a National and World Heritage Site, and in particular the area east of and adjacent to the World Heritage Site buffer zone, which is largely unexplored but is expected to be, to all intents and purposes, part of the historic cultural landscape.

The immediate concern focuses on the Vele Coal Project, which proposes the establishment of coal mining activities, 5 km east of Mapungubwe and located just outside the World Heritage Site buffer zone. The total coal target production is estimated at 5 million tons per annum. Two types of mining methods are to be employed, open cast and underground. Associated infrastructure will consist of road construction, a conveyor

system and a railway link to Musina. It is also our understanding that other infrastructure will include holding dams, a topsoil waste dump and campsite facilities for the engineers.

Related to the Vele project is the proposed establishment of the Mulilo Coal Power Station, south of Mapungubwe and situated within the buffer zone, which in our understanding would be in violation of the conditions of the World Heritage Site. The proposed footprint of the power station would be in the order of 100 hectares with an additional 350 ha for ashing facilities. In addition to the power station the development would include the construction of transmission lines of up to 40 km to link up with the national system and future substation near Musina. The location of the Mulilo power station would take advantage of the Vele coal fields which will provide the new power station with coal.

The area is of particular importance both nationally and internationally for understanding the development and settlement patterns of early African farming communities and the development of the complex Mapungubwe society between 900 and 1300 AD, which in turn gave rise to the sites associated with Great Zimbabwe. These heritage resources south of the Limpopo River therefore inform us about the early history not only of our country but also of Zimbabwe and Botswana.

Discussion

In terms of the National Heritage Resources Act (NHRA), no 25 of 1999, heritage resources, including archaeological or palaeontological sites over 100 years old, graves older than 60 years, structures older than 60 years are protected. They may not be disturbed without a permit from the relevant heritage resources authority. This means that before such sites are disturbed by development it is incumbent on the developer (or mine) to ensure that a **Heritage Impact Assessment (HIA)** is done. This must include the archaeological component (Phase 1) and any other applicable heritage components.

A Phase 1 Impact Assessment Report will identify the archaeological sites and assess their significance. It should also make recommendations (as indicated in section 38 of the NHRA) about the significance of the sites and the process to be followed. Appropriate (Phase 2) mitigation, which involves recording, sampling and dating sites that are to be destroyed, must be done by the specialist as required. Where sites are of extraordinary value the authority may ask that they are conserved in a 'no-go' area.

Where bedrock is to be affected, or where there are coastal sediments, or marine or river terraces and in potentially fossiliferous superficial deposits, a Palaeontological Desk Top study must be undertaken to assess whether or not the development will impact upon palaeontological resources - or at least a letter from a Palaeontologist motivating for an exemption is needed to indicate that this is unnecessary. If the area is deemed sensitive, a full Phase 1 Palaeontological Impact Assessment will be required and if necessary a Phase 2 rescue operation might be necessary (see attached list of accredited Palaeontologists).

As indicated above, any other heritage resources that may be impacted such as built structures over 60 years old, sites of cultural significance associated with oral histories, burial grounds and graves, graves of victims of conflict, and cultural landscapes or viewscapes must also be assessed.

SAHRA is concerned:

- 1) That the current and any future industrialisation of the area will have a negative impact on the Heritage Resources of the area and particularly on the rich landscape of archaeological sites dating back to the Earlier Stone Age and including the early African farmer sites and San rock art
- 2) Heritage and in particular archaeological and palaeontological remains are a non-renewable resource and cannot be rehabilitated.
- 3) Increased industrialisation is also likely to have a negative impact on the integrity of the heritage value because of dust fall-out in this area where the winds trend westwards and also because of the visual impact from and in the Mapungubwe Cultural Landscape National and World Heritage Site. Noise pollution may also be a negative factor.
- 4) The national and international significance of the Mapungubwe Landscape renders the current situation of conducting piecemeal and different Heritage Impact Assessments (HIAs) or Environmental Impact Assessments for developments that are in fact related unsatisfactory. This approach creates a situation where the assessment of significance of the sites and the impact of developments on non-renewable heritage resources is not properly addressed on the broader scale.
- 5) Taking this into consideration, SAHRA is unable to fully address and create guidelines for any impacts on the heritage resources within the Mapungubwe Cultural Landscape on a piecemeal basis

SAHRA Recommendations

- To address these concerns, we require a full combined HIA for the proposed developments, taking into account the current developments (Mulilo Power Station and Vele Project) on the Mapungubwe Cultural Landscape, and any other proposed and related developments of which SAHRA is unaware. This must include all aspects listed in section 38 of the National Heritage Resources Act and particularly section 38(3). We require that although the HIA may include the field reports already commissioned or yet to be commissioned it must, in terms of section 38(2)(a) and 38(3 b&c) also include an overall comment on the heritage significance of the area and of the sites, also what impact increased industrialisation pressure will have on the heritage significance of the area the wider cultural landscape by Dr M H Schoeman and Dr Munyaradzi Manyanga. It will also need to address or make reference to an assessment of the visual impact of these developments and of the long term industrialisation proposed.

Very many thanks for your co-operation.

Yours sincerely



Mary Leslie and Phillip Hine

SAHRA: Archaeology, Palaeontology and Meteorite Unit
and after discussion with Portia Ramalamula: SAHRA Limpopo

For: CHIEF EXECUTIVE OFFICER

Copy: SAHRA Limpopo Office
PHRA Limpopo Office
SanParks
Peace Parks