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POUR L'EDUCATION, LA SCIENCE ET LA CULTURE

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**MISSION REPORT / RAPPORT DE MISSION**

**Mapungubwe Cultural Landscape (South Africa) (C1099)/ Paysage culturel de  
Mapungubwe (Afrique du Sud) (C 1099)**

**15-20 January 2012/15-20 janvier 2012**

This mission report should be read in conjunction with Document:  
Ce rapport de mission doit être lu conjointement avec le document suivant:

**WHC 12/36. COM/7B.Add**

# Mission Report

Reactive Monitoring Mission to Mapungubwe Cultural Landscape

World Heritage Property (South Africa)

15 – 20 January 2012



Figure 1. Core areas of Mapungubwe world heritage site, from K2 towards the east. Photo: Dag Avango.

Mission team: Lazare Eloundou (World Heritage Centre)

Dag Avango (ICOMOS)

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Figure 2. Lazare Eloundou (left) and Dag Avango (right).



## 1. Background to the reactive monitoring mission January 2012



Figure 3. Core area of Mapungubwe national park, from Mapungubwe hill towards the west. Photo: Dag Avango

In accordance with decision 35 COM 7B.44, the World Heritage Centre (WHC) and ICOMOS undertook a joint reactive monitoring mission to Mapungubwe Cultural Landscape, in South Africa from January 17 to 21 in 2012. The WHC received the invitation on 17 September 2011 from the State Party as requested by paragraph 9 of Decision 35 COM 7B.44.

### 1.1 Main mission objectives

The main mission purpose was to assess the progress made in the implementation of the recommendations made by a previous reactive monitoring mission made in November 2010, with particular attention to:

- 1) The additional Heritage Impact Assessment requested in order to assess the potential impact of the proposed large scale coal mining to the east of the property on the cultural attributes of the property that convey OUV. The HIA report was submitted by the Department of Environmental Affairs on 25th November 2011.
- 2) Putting in place a buffer zone to the east of the property, as identified at the time of inscription
- 3) Consider the overall state of conservation of the property.

The mission team was composed of Dr. Dag Avango, ICOMOS, and Mr. Lazare Eloundou, UNESCO WHC, assisted by representatives of the DEA of South Africa. Dr. Dag Avango is a researcher at the Division of History of Science, Technology and Environment, Royal Institute of Technology in Sweden and is specialized in the history large scale natural resource extraction, in particular mining and its societal and environmental impacts. Lazare Eloundou is a conservation architect specialised on World Heritage issues in Africa.

## 1.2 Background information to consider

The mission considered the following main background information:

**2003:** The site of Mapungubwe was inscribed on the World Heritage List in March 2003, on the basis of criteria ii, iii, iv and v. In the 2003 ICOMOS evaluation report three issues were raised:

- 1) Buffer Zone boundaries needed to be addressed to comply with ICOMOS recommendations at the time of the inscription.
- 2) Limpopo – Shashe Transfrontier Conservation Area (TFCA), with the neighbouring countries needed to be defined as this was stated in the nomination dossier as providing an extra layer of protection beyond the Buffer Zone.
- 3) Mining and agricultural operations around the site having a minor impact had to be kept under control.

**2010:** The World Heritage Committee at its 34th Session (Brasilia, 2010), after being alerted about the granting of the mining permit to Coal of Africa Ltd, requested a joint World Heritage Centre/ ICOMOS reactive monitoring mission.

The joint World Heritage Centre/ ICOMOS reactive monitoring mission took place between 13 and 17 November 2010. The mission conducted an aerial survey by helicopter over the Vele colliery, the buffer zone area - including the Venetia mine – as well as the core area of the world heritage site. The mission was also taken on a tour to a number of sites within the Vele colliery area. Moreover, the mission conducted meetings with a wide and representative range of stakeholders (State Party, Mining interests, Civil Society and NGO's, Community leaders and land claimants). The mission also studied maps and plans pertaining to the mining plans of Coal of Africa Ltd.

The mission submitted a report in which it voiced its concerns regarding different issues. Based on the aerial survey, the report was concerned by the continued existence of producing citrus farms within the buffer zone, the presence of wetlands along the Limpopo River that needs protection and the presence of mining sites within the buffer zone and the proposed Limpopo/Shashe Transfrontier Conservation Area (from here on TFCA) – the Venetia mine of the mining company De Beers and the Tuli coal mine in Zimbabwe across the Limpopo river.

Based on the inspection of the Vele colliery area, the report described the mining activities which at the time had been halted while awaiting further assessment of the impacts of mining on the world heritage site. The mission was un-satisfied with a lack of consensus regarding the prevailing wind direction at the



mining site and thus the direction of the drift of dust which will result from open pit mining. The mission did however voice some satisfaction with the set-up of the production process at the colliery processing plant, the mining company's decision to cancel a previous plan to build a power station at the colliery and the fact that whatever system Coal of Africa would build to transport coal, would take the coal in the direction of Musina – not towards the world heritage site core area.

The mission report also presented the results of stakeholder meetings. The state party had expressed commitment to secure a buffer zone around the core area of Mapungubwe cultural landscape, as well as to move forward in establishing the TFCA. The State Party underscored the latter as particularly important in order to secure a buffer zone east of the Mapungubwe cultural landscape core area. As a first step the State Party committed to quickly identifying the land owners in this area.

The missions reported that Coal of Africa perceived that their mining operations at Vele would pose no threats at all to the World Heritage property and claimed that they have and will continue to put in place mitigatory measures to protect the environment and support research efforts. An identical view had been presented by the specialists who produced Coal of Africa's Environmental Impact Assessment. The Mission observed that the specialists commissioned by CoAL passionately advocated the position of CoAL and did not present possible alternative scenarios.

The civil societies and NGO's expressed strong criticism to the mining plans at Vele and warned of dust pollution of water supplies, air and cultural heritage because of prevailing easterly winds. In addition they reported that other mining companies, such as Anglo-Coal, has followed in the foot-steps of Coal of Africa and applied for mining rights in the buffer zone of the world heritage site. The NGO's also complained about not having been consulted on the issue of mining. Community representatives and land claimants were also highly critical of the mining project and the way it had been conducted so far. Their position was that:

- 1) There should be adequate consultation in order to obtain informed consent. To do so, the community leadership insisted on being adequately informed, particularly with respect to the impact of mining on the cultural and natural heritage values of the property.

The report commented that it is an a priori condition of EIA's that all relevant stakeholders be part of the EIA process. It is in this case, also a requirement in terms of the MOU of TFCA.

- 2) All parties, whether in favour or opposed to the mining venture, were united on the opinion that any venture should not negatively impact their natural and cultural environment.

Based on these results, the mission report expressed the view that the State Party should take on board traditional knowledge expertise in the peer review process, especially in relation to the anthropological aspects.

Further, the 2010 mission gave the following main recommendations to the State Party in its mission report:

- 1) As a result of the fact that the delimitation of the buffer zone provided by the State Party, did not include the zone east of the World Heritage site core area: “It is clear that the current status does not protect in an effective way the OUV of the property”. Therefore the mission recommends the State Party to clarify the issue of the buffer zone, since its current extension does not match the buffer zone envisioned in the original nomination dossier of 2003. The Mission recommended clarification of this issue because it is central to the mining licence granted to CoAL. It also has serious implications for other mining proposals understood to be in the pipeline.
- 2) The State Party needs to clarify progress made in consolidating the core zone through acquisitions and agreements with private land holders, as per the commitments made in 2003.
- 3) Both the nomination dossier and the 2003 ICOMOS evaluation report underscore the importance of the TFCA as an important buffering mechanism for both the core and buffer zones. The mission expressed satisfaction with negotiations undertaken to establish the TFCA and encouraged continued efforts.
- 4) Halt the mining activities until a HIA is conducted with the view to evaluate the impact of the mining activity on the OUV of the property.

A Heritage Impact Assessment report was requested from the State Party.

**2011:** At the 35th Session of the World Heritage Committee (Paris 2011) the state of conservation of Mapungubwe Cultural Landscape was examined. The joint WHC-ICOMOS reactive monitoring mission of January 2012 is a result of the decisions taken during the 35th session as prescribed in the Decision 35 COM 7B document.

### **1.3 Terms of reference of the 2012 Reactive Monitoring Mission**

The main tasks of the reactive monitoring mission in January 2012 were to:

- 1) Visit the property and observe if the mining activities has continued to be halted.
- 2) Hold working sessions with the responsible authorities and relevant stakeholders involved in the issuing of the mining licence, as indicated in the paragraph 10 of the Decision 35 COM 7B.
- 3) Hold consultation sessions with the South African institutions and experts who worked on the Heritage Impact Assessment report, for ICOMOS comments and eventual guidance.
- 4) In the event of the mission concluding that the proposed mining might not threaten irreversibly the property's Outstanding Universal Value, provide guidance or hold further consultation sessions, with the State Party, with regard to possible urgent mitigation measures and

monitoring programmes to allow the DG of UNESCO and the Chairperson of the WH Committee to address this issue as requested in the paragraph 11 of the Decision 35 COM 7B.

- 5) Asses the state of conservation of the property, in particular all issues related to the conservation and management of the overall cultural landscape as well as of the archaeological sites within the landscape.
- 6) Submit a joint report highlighting the findings and recommendations of the Reactive Monitoring Mission. The mission report will be prepared by ICOMOS with input of the WHC. The report outlining the main results and recommendations to allow the World Heritage Committee at, examine the property state of conservation at the 36th session in 2012.

## 2. Results



Figure 4. Dongola ranch (buffer zone), local headquarters of Coal of Africa. Photo: Dag Avango

The mission team arrived in Johannesburg – Dag Avango (ICOMOS) on the 16<sup>th</sup> of January and Lazare Eloundou on the 17<sup>th</sup> of January. Assisted by the South African Department of Environmental Affairs (DEA), the team travelled by car to Mapungubwe, in the Limpopo Province. The team was housed at a

former resort for safari tourist named “Dongola ranch”, also used by the Coal of Africa as their local Head quarter office. The ranch is located close to the mining area.

## **2.1. Inspection of the Vele mining area**

On January 18, the mission visited the “Vele colliery” – the Coal of Africa mining area east of the core area of the Mapungubwe World Heritage site. The purpose was to conduct a ground inspection which would allow the mission an opportunity to view either the same areas visited during the 2010 mission or include new ones in order to be able to determine variance from the previous mission and have first- hand experience of the area. Moreover, the purpose was to determine if the mining activities had continued to be halted.

The visit started in the early morning with a security briefing and presentation of the mining operations by representatives of Coal of Africa. The mining company provided the mission team and all other visitors with helmets and protective shoes and demanded alcohol testing as a prerequisite to enter the mining area. After a presentation by former consultant for the Environmental Impact Assessment consultant, advertising and promoting Coal of Africa and its mining project at Vele, the team was transported to the mining site in a four wheel drive. Other visitors followed in open vehicles for safari tourists. Coal of Africa’s site director John Wallington, Chief of Operations Riaan van der Merwe and the main editor and author of Coal of Africa’s Heritage Impact Assessment Prof. Innocent Pikirayi, were in charge of the program of the visit. The mission team was not asked about which sites in the Vele colliery area they wanted to visit.

The visit lasted about four hours, during which the mission team was taken to the following sites:

- 1) An archaeological site from Mapungubwe and K2 period along the main road to the main mining area (site 12 or 13 of the Heritage Impact Assessment).
- 2) Limpopo river
- 3) The open cast mining area

The team was not taken to the processing plant however and after requesting to visit also this area, the mission team returned in the morning of January 19 to the mining area and inspected:

- 4) The processing plant

Still not satisfied with the fact that the mission had not been able to view the mining area from above, the mission requested transport assistance to the summit of Dongola hill – a sharp mountain top rising above the flatland areas and overlooking the Vele mining area. The team visited the top of Dongola hill in the late afternoon of January 19, from where it was able to get a clear understanding of the cultural landscape:

- 5) General overview of the Vele mining area.

The team observed the following during these visits at Vele mining area.



### 2.1.1 Archaeological site 12 or 13 (HIA 2011:57)



Figure 5. Prof. Innocent Pikirayi presenting archaeological site (Mapungubwe / K2) he recommends should be subject to salvage excavation. Photo: Dag Avango

The first visit took place at the archaeological site number 12 or 13 (HIA 2011:57), located within the Vele mining area. Heritage Impact Assessment main author Prof. Innocent Pikirayi presented the site as an example of archaeological sites in the mining area which, according to him, needed to become subject of rescue excavation. The reason, Pikirayi stated, was its location at about 20 m from a service road (gravel) to the mining area and the risk of damage from road works there in the future. Answering on a direct question from the mission team, Pikirayi saw no possibilities to protect the site other than destroying it through excavation. Instead he strongly advocated salvage excavation for this and a number of other similar sites in the mining area. In the presence of the mining company director and the chief of operations, Pikirayi emphasized that Coal of Africa will finance the salvage excavations and underscored the value of those suggested salvage excavations for increasing our knowledge on the history of Mapungubwe. These statements are similar to those presented by Pikirayi and his team in the Heritage Impact Assessment (HIA 2011). The mission team are critical to this approach, which is further commented in section 2.3.3 in this report.



### 2.1.2 Limpopo river



**Figure 6. System of fences and barbed wires alongside the Limpopo River, originally built to restrict movement across the border with Zimbabwe. These fences still dominate the landscape by the river. Photo: Dag Avango**

The mining operations as well as the processing plant at Vele require vast amounts of water. Coal of Africa takes this water from Limpopo River and the mission team visited a water pumping site built by the company along the river. The pumping station consisted of a number of pipes visible above ground at a spot located approximately 50 meters from the river. In the vicinity nearby citrus farms are already pumping out water for their watering needs. Apart from the river, the landscape of the area is dominated by a massive system of fences and barbed wires following the river about 75 meters inland. These fences were built in order to control movement across the border with Zimbabwe.

In this general context, the visual impact of the water intake on the cultural landscape is rather insignificant. Seen as a whole, these structures are a part of time layer of the Mapungubwe cultural landscape buffer zone that contrasts and conflicts with the OUV of the core area of the World Heritage site. However the mission was concerned about the increasing number of water pumping sites which could in a long term affect the integrity of the World Heritage site, by affecting the water table of Limpopo River.



Figure 7. Water intake for the Vele colliery by Limpopo River. In the background the fence and barbed wire system along Limpopo River is visible. Photo: Dag Avango.

### 2.1.3 The open cast mining area

The visit at the open cast mining area revealed that Coal of Africa has conducted work at the mine since the visit by the 2010 mission at the site. When the mission team asked Coal of Africa site director John Wallington if the company had re-started its mining operations, he confirmed that this was the case but he stated also that mining operations had not been extended since 2010. According to John Wallington and Riian van der Merwe, the company have been mining only within the footprint of the open pit area which the company was operating at the time when it was ordered to stop its mining operations. According to their statements, the Vele project would be ready to go in to full production by the end of January 2012 and they presented the ambition to go in to full production on March 1 2012. At the time of the mission team visit, there were 500 workers and engineers already recruited and working at the site.

At the site, the mission team observed the traces of the recent mining works. However, when visiting the mining area to inspect the processing plant the following day, the fact that Coal of Africa has resumed its mining operations became crystal clear. By the gates of the mining areas, there were large amounts of workers on their way in to the various work sites in the mining area.





Figure 8. Workers waiting to start their working day, outside the gates of the Vele mining area. Photo: Dag Avango.



Figure 9. Mine work at open pit "open cast east", Overvlakte, Vele mining area. Photo: Dag Avango

Operations manager, Riian van der Merwe answered all questions pertaining to the mining plans of Coal of Africa at Vele. He repeated the same mining plan which the company has presented through previous reports (EMP, EIA, HIA). Upon being asked by the mission team about the rationale behind Coal of Africa's decision to mine underground in the north-west while mining open cast in the south-east, Van der Merwe answered that their choice was not motivated by the position of the coal seam in those areas. The coal seam is located at more or less the same depth. Instead, their plan is motivated by the ambition to avoid harming the big commercial citrus farms along Limpopo River. The inland areas to the south and south-west did not need such protective measure, because according to Coal of Africa, its only dry bush land. This statement contrast with the otherwise stated ambitions by Coal of Africa to prioritize cultural heritage protection at Vele.

Finally it should be noted that the open pit site which is at Vele colliery, in its current form, is only a limited version of the open pit that Coal of Africa will move forward across the landscape once they put their mining operations in to full speed. Yet, the visual impact of even this "small" intrusion in the landscape is substantial and will not only destroy any cultural heritage showing up in its way, but will obviously also modify the cultural landscape. Once the open cast mines are refilled and the bush replanted, what remains will be a cultural landscape of coal mining, not a cultural landscape of the K2 and Mapungubwe periods. Therefore, the mission team does not agree with the statement of the HIA that the impacts of mining at Vele on the OUV of Mapungubwe cultural landscape will be minimal.



Figure 10. Western section of the open-cast mining area. Photo: Dag Avango.



#### 2.1.4 Processing plant



Figure 11. Part of the processing plant of Vele Colliery. Photo: Dag Avango

The layout of the processing plant is, from what the mission team could judge, in accordance with the plans presented previously by Coal of Africa (in EMP, EIA, HIA). The representatives of Coal of Africa underscored the efforts they had made to reduce the visibility of the processing plant, by limiting its maximum height to 40 meters. According to their statements, the plant was 95 % finished already in November 2011.

The Coal of Africa representatives stated that the company has arranged belts of vegetation throughout the processing plant area. While the mission team were indeed shown examples of this, the processing plant area also gives an instructive example of the how the mining company views cultural heritage protection in the Vele mining area. In the middle of the processing plant area, the company has fenced off a patch of land said to contain archaeological remains (figure 12). The mission team was presented the fenced patch as an example of what can be done to protect archaeological sites in the mining area – a method also pointed out in the HIA as the way to go. However, from the mission team point of view, the value of the archaeological site is gone forever, since it is surrounded by a vast industrial landscape that has reshaped the historical landscape which the fenced in archaeological remains once formed a part of. In the light of this site, it is difficult to share the optimism voiced by the HIA regarding the possibilities to preserve the remaining attributes in the Vele colliery area that are associated with the OUV of the property.





**Figure 12. Fenced archaeological site at the processing plant area of Vele colliery. Photo: Dag Avango.**

The visit at the processing plant made it clear that Coal of Africa has continued to develop also this site since the mining operations were officially halted in 2010. According to Coal of Africa management team, the production line will be ready to produce with full capacity by January 31 2012, and according to plan be taken in to full production by March 1.

On the eastern side of the processing plant, the mission team observed the clearest evidence of the already on-going mining operations. On an area cleared from vegetation close to the plant, the mining company has stored substantial amounts of coal, ready to be processed in the plant (figure 13).



Figure 13. Piles of coal recently mined at the open cast mining area, stored at Vele colliery processing plant. Photo: Dag Avango.

#### 2.1.5. General overview of the Vele mining area

In order to get an overview from above over the Vele mining area, the mission team requested assistance to get to the top of a hill situated nearby Gondola ranch. In the afternoon of January 19, the mission team was transported by car to the hill top together with John Wallington and Riian van der Merwe of Coal of Africa.

From the hill top it was possible to get an impression of the visual impacts of the mining activities at Vele on the surrounding cultural landscape.

- 1) The most prominent feature of the area, at this stage of development, is the processing plant.
- 2) Another prominent feature is the new access road to the western open cast mining area and processing plant

In addition, the mission team also observed features which the team had not been shown during the tour of the mining area on January 19.

- 3) Landing strip. It was explained to the mission team that Coal of Africa had used an old dirt road as the bases for the landing strip, by widening the road (figure 14).



Figure 14. Landing strip of Vele colliery, constructed by widening an existing gravel road. Photo: Dag Avango.



Figure 15. Vele mining area. In the left half of the photo, the processing plant and the access road are visible. On the right side of the lower half of the photo (west of the access road) is a patch where the bush has been cleared. Photo: Dag Avango.



4. Large clearing of bush west of the access road. When asked what the clearing was, Coal of Africa answered that it was made by contractors and that they had been furious with them for clearing such an unnecessarily large area. Later they backed away from this statement and claimed that the mission team must have misunderstood something. Therefore, the large clearing observed by the mission team remains to be explained (figure 15).

## 2.2. Inspection of Mapungubwe cultural landscape core area

On the afternoon of January 19, the mission team inspected the core area of the World Heritage site. The team visited all the main archaeological sites: Schroda, K2, and Mapungubwe hill. In addition, while travelling between these sites on gravel roads, the team had the opportunity to inspect also a wider area of the cultural landscape in between sites.

### 2.2.1. Schroda archaeological site



**Figure 16. Schroda archaeological site. The site does not contain any prominent features but the ground at the site carries plenty of artefacts which together with the landscape are clear attributes of the property's OUV. Photo: Dag Avango.**

The team visited Schroda and were taken on a short walk across the site. Schroda represents the first phase of the time period during which Mapungubwe cultural landscape was formed. The site has been subject to archaeological excavation. At a first glance, it has few visual remains from the Schroda period (figure 16). However, spread over much of the site there is a large number of artefacts – pottery as well as metal objects – which often are lying right on the surface ground of the site (figure 17). For this

reason, the SANParks does not allow any visitors at all at the site at present because of the risk for visitor induced erosion and theft of artefacts. There are no signboards or any interpretative support for visitors at the site.

The mission team were satisfied with the state of conservation of the site, as well as the restrictive policy of SANParks to visitors. The mission encourages SANParks to maintain this policy until proper interpretation strategy and visitor management for the overall property is put in place.



Figure 17. Example of pottery found on the ground surface at Schroda. Photo: Dag Avango.

### 2.2.2. K2 archaeological site

The mission team made a brief visit at K2, the most prominent site representing the K2 phase of the time period in which the Mapungubwe cultural landscape was formed. The site has been subject to archaeological excavation after which the site has been reinforced by earthworks and sandbags in order to protect it against erosion. A set of displays provide visitors with an interpretation of the site.

The mission team observed that K2 was seriously deteriorated. The earthworks and sandbags built to support the site were in a bad shape, the sandbags partly exposed above ground (figure 18). As one of the major place containing evidences that allowed justification of the OUV, the mission is concerned that a particular attention seems not given to the conservation of this archaeological site. It is important to realize that the current condition of K2, if not improved could result in the property being considered for



the List of World Heritage in Danger, because of the serious deterioration of the archaeological materials, that are a key attribute of OUV.. The mission team recommend that a condition survey of K2 is undertaken as soon as possible and a conservation plan developed in order to launch its rehabilitation.



Figure 18. Earthworks and sandbags built to protect the K2 site from erosion. The system needs maintenance efforts, which can be seen from the exposed sandbags (visible on the left side of the picture). Photo: Dag Avango.

### 2.2.3. Mapungubwe hill

The mission team visited Mapungubwe hill – the most prominent site representing phase 3 in the development of the Mapungubwe cultural landscape. The mission team was guided across the site by the SANParks site manager and his archaeologists. The site contains some visible remains of structures and there are numerous artefacts present on the top-soil at the site. SANParks team explained to the mission team that all visitors groups at the site are monitored by their guides, in order to prevent removal of artefacts from the ground. In addition, visitors are never allowed to go beyond the zone of the hilltop which has already been subject to archaeological excavation – a policy that leaves at least 2/3 of the hill top unaffected by visitors.

SANParks have further protected the site by placing walkways protecting particularly sensitive parts of the site from erosion from visitors (figure 19).

From what could be observed during the short visit at Mapungubwe hill, the site was relatively in a good state of conservation but would also need a condition survey.



Figure 19. Wooden walkways protecting sensitive parts of the Mapungubwe hill site. Photo: Dag Avango.

#### 2.2.4 Mapungubwe cultural landscape World Heritage Site core area – general observations and remarks

The mission team was transported to and between the sites in the Mapungubwe cultural landscape World Heritage Site core area by car. During this trip, the team observed the following:

*Infrastructures for mining:* in a multitude of places in the northern part of the core area of Mapungubwe cultural landscape World Heritage Site, there are technical installations who are part of the infrastructure of De Beers diamond mining at Venetia mine on the southern side of the property. This infrastructure provide the Venetia mine with fresh water from the Limpopo river and consists of (i) electrical wires on poles, (ii) electrical link and transformer stations, (iii) a dam, (iv) a pump house complex and (v) pipes for fresh water transport (see figures 20, 21 & 22).

The mission team wants to draw attention to the existence of those infrastructures because they are located inside of the core area of the Mapungubwe cultural landscape and World Heritage site. They have a substantial visual impact and are located along what used to be the main life line of the Mapungubwe society – the Limpopo River. Thus, the infrastructures strongly interfere with the OUV of this part of the property's core area. A plan is needed to determine the future of these structures. Moreover, since their existence must be explained by the fact that the core area of Mapungubwe cultural landscape is situated right between Limpopo River and the Venetia mine, it is easy to predict



what impact further mining developments in the southern buffer zone would have on the World Heritage site core area (see section 5.3).



**Figure 20. Electrical installations associated with the fresh water infrastructure of the Venetia mine, close to Limpopo River in the core area of the world heritage site. Photo: Dag Avango.**

*Fences:* Along the Limpopo River, inside the core area of Mapungubwe World Heritage site, there is a metal fence with barbed wire as well as electrical wires which effectively cuts off all access to the river from the property. According to Coal of Africa representatives, this fence system is meant to protect the river side from elephants (figure 22).

The Limpopo River is clearly one of the most central attributes carrying the OUV of the Mapungubwe World Heritage site. Therefore, these fences inside the core area of this World Heritage site, has a substantial impact on its integrity. Not only does it have a great visual impact on the landscape, it also stops visitors from experiencing the river and its relation with the cultural landscape, by blocking access to it. Moreover, the fence stands in direct conflict with the stated plans for the design of the TFCA at the time of inscription.



Figure 21. Pumping station, part of the infrastructure supplying De Beers Venetia mine with fresh water. The station is located close to Limpopo river, inside the core area of Mapungubwe World Heritage site. Photo : Dag Avango.



Figure 22. Fences of barbed wire and electrical wire, inside the core area of the Mapungubwe cultural landscape, blocking access to the river. Photo: Dag Avango.



In addition, the team observed the following:

*Roads in poor state:* the roads in the area are, in general, in a good enough shape to allow four wheel drive vehicles to reach the different destinations in the area. The team noted, however, that roads leading to and from infrastructures associated with the mining activities of De Beers at the Venetia mine are in a much better condition than the roads leading to Mapungubwe hill, K2 and Schroda. The severe condition of the road at these sites makes them hard to access. Therefore, the mission team call for better road maintenance to improve access to these important sites.

*Interpretation:* There is interpretative guidance available at two of the archaeological sites visited by the mission team at Mapungubwe cultural landscape – K2 and Mapungubwe hill. At K2 it consists of a series of seven screens with texts and photographs, displayed inside a concrete shelter, built into a midden at the centre of the site (figure 23). At Mapungubwe hill, it consists of a profile cut through the cultural layers of an archaeological site. The profile is explained to visitors by signboards with text. The arrangement is located by the foot of Mapungubwe hill, by the parking space where visitors arrive, and is built in to a concrete shelter below ground level. The shelter is covered by a sliding steel lid, which the SANParks guides remove when arriving with visitors (figure 24). The installations at Mapungubwe hill and K2 are rather well hidden in the landscape and do not disturb the experience of the site in any profound way.



Figure 23. Shelter at K2 containing a series of displays which explains the site to visitors. Photo: Dag Avango



At the top of Mapungubwe hill and at Schroda, there is no interpretative guidance at all. On the positive side, this absence of arrangement leaves the landscape at the sites unaffected. However, visitors to the site will need interpretative guidance in order to understand what they are observing.

Therefore, the mission team believe that an appropriate interpretation plan for all the main archaeological and rock art sites in the core area of Mapungubwe cultural landscape is needed. Such an interpretation will consist in adopting a clear message to explain the World Heritage values and, in producing interpretative support consisting of simple printed information folders. Visitors could then take this printed information along when visiting the property, or of electronic devices containing a speaker voice which visitors can listen to.



**Figure 24. Sub-surface concrete shelter at the foot of Mapungubwe hill, displaying a profile of archaeological layers as well as signboards explaining the site to visitors. The arrangement is covered by a steel lid in between visits. Photo: Dag Avango.**

*Need for an integrated management plan:* During the visit to the different parts of the Mapungubwe cultural landscape core area, SANparks team informed the mission team on how the sites were managed at present, as well as plans on how to develop the sites in the future. The mission team asked to see the revised management plan for the area, in order to better understand those plans. However, at the time of the visit, there was no printed version of this plan.

Therefore, the mission encourages SANParks to produce a printed document outlining their management plan for the Mapungubwe cultural landscape, and submit it to the World Heritage Centre before the 36th Session of the World Heritage Committee.

## **2.3. Stakeholder meetings**

### **2.3.1. Meeting with leaders of local communities**

In the morning hours of January 19, the mission team participated in a stakeholder meeting in which leaders of local communities presented their view on the Heritage Impact Assessment and Coal of Africa's mining project at Vele.

A representative of the consultants who had produced the Heritage Impact Assessment opened the meeting by showing the community leaders a GIS generated film, imitating a fly-over of the Vele colliery and adjacent areas. The fly-over started at the Vele colliery, while the presenter claimed that the mine had only a limited impact on the cultural and natural landscape. From there the fly-over continued to Venetia mine on the southern side of the Mapungubwe Cultural Landscape buffer zone, which was presented as a huge impact on the local environment. From there, the film continued to the closed Tuli coal mine, located in Zimbabwe just across the Limpopo River opposite Vele, contrasting it with Vele. It was obvious to the mission as well as to stakeholders present, that this film was carefully designed to present the Vele mining project as only one out of many industrial operations in the area and in the most favourable way possible as the industry with the most insignificant impact on the OUV of the area.

After the film, Prof. Innocent Pikirayi presented a summary of the HIA to the stakeholders. After this presentation, the session continued with presentations of local community leaders.

#### ***Tshivhula Royal Family***

The representative of the Tshivhula royal family was strongly critical to the Vele mining project as well as to the process in which the mining project had been developed so far. The representative stated that their main concern was the fact that they had not been consulted since the meeting held with the WHC-ICOMOS reactive monitoring mission team in November 2010. The representative emphasized that they had people living on the Vele colliery property and therefore wanted full clarification on the issue of local impacts of the mining project.

The Tshivhula royal family representative expressed the wish that before this process was concluded, their community should be consulted in order to ensure the protection of the graves of their ancestors as well as other interests of the community. So far, the community does not feel that they have had any influence on the process at all.

#### ***Leshiba Royal Family***

The representative of the Leshiba Royal Family voiced similar concerns and criticisms. In July 2011, the community had been contacted by Coal of Africa and the company arranged a meeting. According to the representative however, Coal of Africa did not announce the meeting properly and did not invite the proper representatives of the community.

The Leshiba Royal Family representative brought forward the following main concerns of his community:

- 1) The HIA team did not consider the opinion of the Leshiba community.
- 2) The consultancy firm which had produced the HIA, was obviously representing Coal of Africa and speaking on their behalf. The HIA should have been made by a consultancy that was not sponsored by Coal of Africa.
- 3) The community could potentially have had a positive attitude to the mine, if they had been allowed to have a stake in its development. As a community, Leshiba should be given a stake in the mining project in the form of skills development etc.

In conclusion the Leshiba royal family representative stated that his community still feel that they cannot accept the mine and the mining company, because they have not involved the community in the process.

### *Machete CPA Royal Family*

The representative of the Machete Royal Family was also strongly critical of the mining project and the HIA. Revealing the division between the local communities in the area, he opened by stating that the Machete community was the only community which had traditionally lived in the area – “...since time immemorial”.

With a point of departure in this statement, the Machete representative stated that Machete had not been asked to take part in the HIA. The community had not been consulted in any way.

The community leader was particularly critical because allegedly, already in 2005, the Machete had demanded an inspection of the Vele mining area focusing among other things on the graves of their ancestors. In March 2011, an inspection had taken place but without consulting the Machete community.

The Machete community representative was also strongly critical on another point in the HIA. The Vele colliery is located in a zone where anti-apartheid fighters struggled with the South African army during the 1960's and 1970's. During those years, Umkhonto We Sizwe (Spear of the nation), the military forces of the ANC, attacked the military forces of the apartheid state from bases across the border in Zimbabwe and Botswana. According to the Machete representative, these liberation fighters died and were buried among other places in the Vele mining area. Those graves are a heritage of all South Africans according to the representative and he regarded it as an insult to South Africans that the consultancy has not discussed them in the HIA.

Thus, based on those points of criticism, the Machete representative questioned the legitimacy of the HIA.

### *Vhangona cultural movement*

The representative of the Vhangona cultural movement opened his talk by stating that to the Vhangona cultural movement, it seems that Coal of Africa is determined to go ahead without consulting the Vhangona community – because they have political backing. The representative stated that the Vhangona community had taken part in two separate meetings with Coal of Africa in June 2011. A first

meeting had ended in failure, because according to the Vhangona representative, Coal of Africa had not provided proper opportunity for the Vhangona to voice their opinion. Therefore a second meeting was held, which allegedly also ended in failure. The Vhangona representative claimed that Coal of Africa had ordered the community leaders to cut their presentation short and sit down. At the end of the meeting, Coal of Africa had allegedly promised to return with feedback on the criticisms voiced by the community but never did.

Based on this background, the Vhangona representative concluded that the project could have benefits to the community, but the Vhangona have not been consulted in a respectful way. Vhangona feel that they want justice and that Coal of Africa does not give them that justice. The representative of the Vhangona cultural movement presented UNESCO with a statement of their opinion (included in the appendix of this report, 5.3).

### *Discussion*

The stake holder session ended with an open discussion. During this discussion, the feelings ran high in the meeting room. Representatives of the communities' repeated and emphasized statements already made, but also presented new arguments. Some suggested bringing Coal of Africa to the high court while others proposed to "taking the law in to our own hands". Some speakers were concerned about the division among the community leaders regarding land rights in the area, pointing out that Coal of Africa profits from such division and suggested that unity among the local communities would strengthen their case.

The discussion reveals the necessity to provide serious opportunity for the local communities to influence the future of the Vele mining area.

### *Conclusion*

From the presentations of the leaders of the local communities it was clear that none of the communities feel that they have been properly consulted or indeed consulted at all – neither by Coal of Africa nor by the consultancy the company hired to produce the HIA. None of the community representatives were willing to give any legitimacy to the HIA, because: (a) they do not feel that they have been properly consulted by the consultancy firm producing it and (b) because they feel the tendency of the consultancy firm to present all activities of Coal of Africa in the most positive way "imaginable". The mission team therefore recommends that the preparation of the revised management be an opportunity to put in place a management committee, in which the community will be represented to ensure that their expectation with regards to Mapungubwe's management is carefully considered.

The new consultation with the various communities could also contribute to collect accurate data on the history of the local inhabitants of the Mapungubwe area and how the site have been used until the end of the apartheid era. This exercise will then allow a much needed improvement of the initial study adopted as a part of the HIA.



### 2.3.2. Meeting with representatives of NGO's

The following session was devoted to the concerns of local NGO's.

#### *Mapungubwe action group and Mapane Bush Lodge*

The first NGO to present their view was the Mapungubwe action group and Mapane Bush Lodge. Mapungubwe lodge is a tourism business, while the Mapungubwe action group is an association of residents and concerned people in the Mapungubwe area. The presenter is the vice chairman of this group, but also play a central role in other organisations with a stake in the future of Coal of Africa's mining project by Mapungubwe World Heritage site. He is chairman of the Mapungubwe National Park Forum, chairman of the Limpopo Valley Conservancy, a member of the Tourism Working Group, vice chairman of the Musina Tourism Association and in addition he owns and manages a tourist resort called Mopane Bush Lodge which is located right between Vele coal mine and the core area of the world heritage site.

The Mapungubwe action group and Mapane Bush Lodge voiced strong concerns about Coal of Africa's coal mining project at Vele and pointed out seven main issues which would impact in a negative way on the property and the local stakeholders in the surrounding area. The first one is the on-going construction of a new access road to the mining area. The second issue is increased pollution in the form of dust, smell, noise and light. The mission team were particularly alarmed by the groups estimation of such pollution from transports. According to the Mapungubwe action group representative, Coal of Africa will transport the coal from Vele to Mussina on trucks taking 35 ton loads along the road R572 – the access road to Mapungubwe. This road was originally built as a military road with a load limit of 10 tons. According to the estimates of the action group, the number of number of trucks at full production capacity at Vele will be one every 1¼ minutes throughout the day & night (408 truckloads & 408 trucks returning empty every day).

These impacts would lead to a loss of exclusivity and sense of place, a loss of the wilderness experience that tourism companies are selling in the area. A third concern is the possible negative effects on the fresh water supply of the area. The action group representative mentioned water shortage as well as acid drainage from the mining area in to the Limpopo water system. A fourth and severe threat is the risk having a deleterious impact on the property's OUV and the serious effect that would have on the growing tourism industry in the area. A fifth related concern is the fact that the mining project presents a deviation from the original plan to develop the TFCA with Zimbabwe and Botswana. Once the TFCA comes in to place, it will open up new opportunities for organising cross border tourism in the area. The sixth issue is, according to the action group representative, that the area would lose a planned scheduled air service. A seventh point is that the mining project is bringing and will keep bringing negative publicity for tourism to Mapungubwe.

The Mapungubwe action group and Mapane Bush Lodge brought a particularly important issue on the table during the presentation – the plans by other mining companies to mine the same coal seam as Coal of Africa intends to mine at Vele colliery (figure 25). The same plans were mentioned by HIA author Prof. Innocent Pikirayi, both in his presentation of the HIA at Dongola ranch and in the HIA itself, and by

ASAPA (see following section). The coal seam at Vele is present in a vast area extending in a west / south-westerly direction, right through the centre of the buffer zone south of the core area Mapungubwe cultural landscape world heritage site. According to stakeholders as well as the consultancy firm which produced the HIA for Coal of Africa, there are several mining companies that are applying for licenses for mining this coal seam. These companies are carefully monitoring the development of the Vele colliery project.

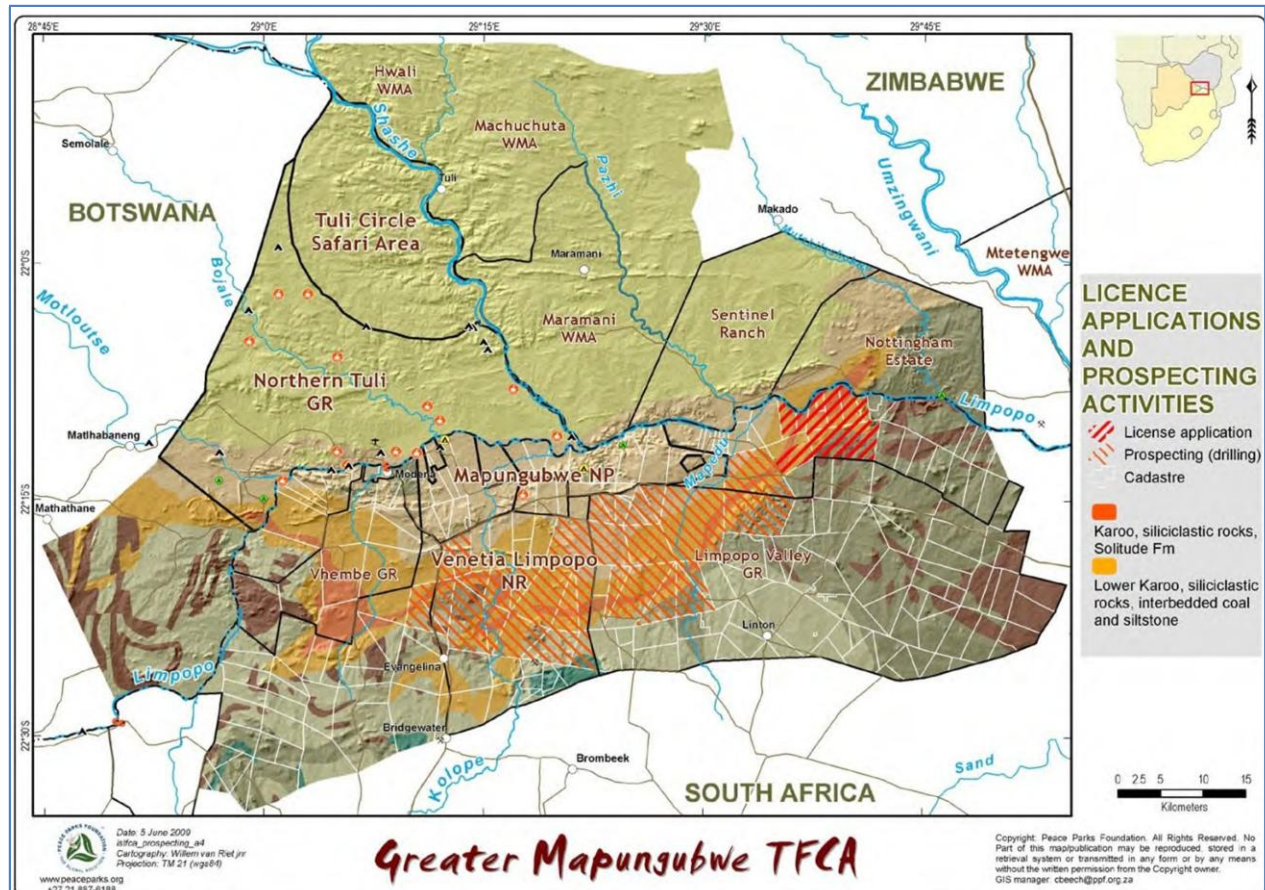


Figure 25. License applications and prospecting activities in the buffer zone of Mapungubwe Cultural Landscape world heritage site.

In summary Paul Hatty concluded that Mapungubwe action group and Mapane Bush Lodge were concerned about a lack of progress in the format and implementation of public participation in the HIA or the Buffer zone issues. They were dismayed that the Government has reneged on its commitment to keep suspended the mining until the HIA is completed and accepted. Moreover he expressed disappointment that the Buffer Zone issue has not been resolved and ended by stating that his Mapungubwe action group is willing to participate and help resolve these issues. It should be noted in this context that the Mapungubwe Action Group has recently signed an agreement with Coal of Africa, which may influence its evaluation of the mining project in the future.

### *Association of Southern African Professional Archaeologists (ASAPA)*

The second NGO to present its case in this section of the stakeholder meetings was a representative of the Association of Southern African Professional Archaeologists (ASAPA). The representative recapitulated the concerns and criticisms which ASAPA has voiced previously in the process and briefly described the events which led to the decision of ASAPA to strike a deal with Coal of Africa in the form of a memorandum of understanding. In this memorandum ASAPA and Coal of Africa agrees to cooperate in order to protect the cultural heritage of the Mapungubwe Cultural Landscape.

The representative focused the rest of the presentation on the comments of ASAPA on the HIA. At the time of the meeting ASAPA had only had the opportunity to comment on a few appendices of the HIA, which the organisation had managed to obtain in an unofficial manner.

The main points of concern for ASAPA are the following:

- 1) ASAPA was concerned by the lack of specificity when discussing changes to the buffer zone.
- 2) ASAPA felt that the status and role of SAHRA as compliance agency was not made clear.
- 3) ASAPA felt that the document did not fully address the impact of mining on the sense of place and authenticity.
- 4) ASAPA reasserted that accredited Principle Investigators should conduct assessments, specifically regarding Stone Age sites.
- 5) ASAPA again raised the need for a cumulative impact assessment.
- 6) ASAPA also pointed out the need to have thorough management plans, which obviously should include monitoring.

In addition, ASAPA raise the following concerns about the mining plans of Coal of Africa:

- 7) Having Vele mine so close to the Mapungubwe Cultural Landscape World Heritage site is definitely not ideal.
- 8) Mining in the vicinity of the so “declared” buffer zone is not acceptable.
- 9) ASAPA does not agree with a contraction of the buffer.
- 10) ASAPA notes with concern that more than 20 prospecting licenses as well as gas exploration permissions have been granted in the declared Mapungubwe Cultural Landscape buffer zone.

As a way forward, ASAPA expressed its support for the recommendation in the HIA to extend the buffer on the Eastern side of the core area of the property, right up to the Vele boundary. ASAPA also called for transparency and thorough consultation in decision making processes regarding the World Heritage area. In addition, ASAPA voiced its strong opinion that the rehabilitation of the mining impact on the Mapungubwe Cultural Landscape by CoAL should exclusively be guided by the OUV’s.

After having received the full HIA document at the time of the reactive monitoring mission meeting, ASAPA supplemented these comments in a letter to ICOMOS and UNESCO (through representatives Dag Avango and Lazare Eloundou Assomo). This document elaborates on some of the above mentioned points, but also adds new ones. These comments are included in the appendix of this report.



### **2.3.3. Comments on the HIA by the ICOMOS and UNESCO reactive monitoring mission**

#### ***Background***

The HIA was carried out by Siya Thembana Trading Ltd in November 2011 for Coal of Africa for their submission to the South African Department of Environmental Affairs. The report was submitted to World Heritage Centre in November 2011.

The Terms of References include the need to follow ICOMOS Guidance on Cultural Heritage Impact Assessments for World Heritage Properties in order to identify the potential impact of the proposed Vele coal mining proposals on the attributes of OUV within the context of a Statement of OUV that has been agreed by the World Heritage Committee.

The general impression of the mission team is that the HIA is of a good standard and has been carried out in a professional manner. The text and illustrations are clear and the authors are to be commended for their professionalism.

However, the following comments stand out after a careful review of the HIA.

#### ***Structure of the HIA***

The study is based on desktop research, field visits and interviews with relevant stakeholders. The HIA states that it has taken account of the ICOMOS Guidance on HIAs, as well as on other local guidance.

The HIA considers not just the potential impact of the proposed coal mining on OUV, it also considers other issues that are not strictly related to the core purpose of the HIA such as mining activities in the wider setting of the property, (including in neighbouring countries) and other threats to the property (intensive agricultural, game, and infrastructure projects) and also stakeholder involvement and the buffer zone. These sections are interesting and helpful in considering the overall management of the property and do to an extent help in understanding the context of the national debate on mining.

Finally the HIA sets out conclusions on the potential impact of the Coal Mining and puts forward recommendations to mitigate the impact of mining and to address other identified negative factors.

#### ***General comments on the HIA***

Although the HIA mentions that the ICOMOS Guidance on Heritage Impact Assessment has been taken into account, the methodology that this Guidance sets out has not been fully followed.

The Statement of OUV (see Annex 1 in the appendix) that has been agreed by the World Heritage Committee is not set out in the HIA – merely the justification for the criteria agreed by the Committee at the time of inscription. This is unfortunate as this means that there has not been an attempt to identify and list the attributes that convey OUV, then to consider how the area of the Vele Colliery relates to those attributes and thus then to consider how coal mining might impact on those attributes. Instead impact has been considered on discrete archaeological sites within the Vele area on one hand and on the core area of the World Heritage site on the other.

The cultural heritage at Vele is the result of the same historical processes as in the core area of the World Heritage site of Mapungubwe. Therefore it is necessary to set out which attributes (archaeological sites and landscape features such as the river) carry and convey the OUV within the property. When having defined how these attributes carry the OUV, it should also be possible to assess how the archaeological sites and landscape features within the mining area are associated to those attributes and support them. Once this knowledge is established, it is possible to determine how to mitigate and monitor in order to minimize the impact on the OUV. It is the conviction of the mission that these elements need to be clearly set out.

A related weakness of the HIA is that it lacks a holistic approach. The HIA includes useful data on the scope of Iron Age settlements along the Limpopo river basin in Figure 4, and settlements in Figure 6. It also sets out clearly in Figure 11 the wider context for Mapungubwe within the various states that developed around and near the Limpopo and Shashe rivers. From these the influence of the flood plains of these rivers is clear – and this is emphasised on page 17 of the text where it is indicated that the alluvial plains allowed agriculture to support comparatively large populations.

Mapungubwe needs to be considered in this wider context of the way Iron Age people utilized and developed their societies by using the river basin and the interface between Mapungubwe and other kingdoms such as Khami, Great Zimbabwe and Tulamela. It is clear that Mapungubwe did not exist in isolation but was a fundamental part of a wider area within which states developed on the basis of agriculture made possible by river floods, the exploitation of the hinterland for gold and ivory and trade. Furthermore as is shown in Figure 11 in the HIA the extent of influence of the Mapungubwe kingdom extended beyond the boundaries of the property. The data shows clearly that the area of the Vele colliery was a part of Mapungubwe at the height of its powers. The attributes that convey these link need to be identified and protected.

The Mission considers that the Vele area needs to be considered in this wider context. Currently the HIA sets out a list of Iron Age sites within the colliery area but does not relate these to the

wider landscape context. Mapungubwe was inscribed as a cultural landscape for the way the extensive archaeological remains and rock art can be read in spatial terms. Looking beyond its boundaries of the core area and it is clear that there is a continuum with the wider Limpopo river basin that needs to be considered.

What is missing from the HIA is an understanding of the way the landscape of the Vele area relates to the wider river basin and to the inscribed property. Although the authors of the report stress that individual archaeological remains in Mapungubwe Cultural Landscape should be valued as elements in the larger historical cultural landscape of the property, the section of the HIA that considers value and significance only deals with the significance of individual sites rather than the value of the ensembles of sites or the value of the cultural landscape.

#### *Impacts not addressed in the HIA*

The mission team identifies a lack of specificity on number of issues pertaining to the impact of mining on Mapungubwe Cultural Landscape OUV.

The assessment of the impact of the mine in the landscape (4.5.1 pg 42) could have done more to take into consideration the impact of dust and chemical products on the natural environment in and around the Cultural Landscape. It does consider dust as a possible factor of high negative impact on the sites but doesn't offer any mitigation measures for it. Table 1 page 50 does not specify on which attributes of the Cultural Landscape the impact is assessed.

Another issue on which the HIA could have been more specific concerns impacts of underground mining. Table 1 pg.52 considers vibration as a possible factor of high negative impact but doesn't offer any mitigation measures for it. Attributes that will be affected by underground mining are not specified either. *The mission team asks for clarification on this point.*

The report describes indirect impacts, but there is no clear specification on what is considered an indirect impact and on which attributes this indirect impact can be observed and how it can be mitigated. *The mission team asks for clarification on this point.*

#### *Comments on the outcomes of the HIA*

The lack of a holistic approach and a proper understanding of the concepts of OUV and attributes come out in a disturbing manner in the conclusion of the HIA, stating that:

*"The mining activities of Coal of Africa Limited do impact on the elements of the Mapungubwe cultural landscape and its OUV. These impacts are indirect in that these mining activities, which are taking place outside the core and buffer zone of world heritage property, will only affect sites*



*of the same cultural period as those found in the core area of the MCLWHS. However, these impacts are minimal and can be mitigated to safeguard the OUV of the MCLWHS.”*

This contains contradictions regarding the impact assessment of the mining activity of Vele Colliery. On the one hand it is stated that the mining does indeed impact on the property and its OUV, while on the other hand it states that as the mining is not in the property or its buffer zone, the impact is minimal.

In addition and based on the 2003 ICOMOS evaluation report, the mission questions the statement made above. The mission considers Vele to be located within the borders of the buffer zone that was defined at the time of inscription on the World Heritage List in March 2003.

As the HIA considered only specific sites within the Vele area as being of significance, the mitigation measures that are being suggested deal only with specific sites and not the larger landscape context of which they form a part.

At the site of the planned open cast mining area at Vele, the report expects that a number of archaeological sites will be threatened by the mining activities and recommends, as a mitigation measure, that these sites be protected by fencing or flagging, or be recorded in advance of destruction. In the Mission’s view this is not mitigation.

The Mission understands that the consultant team which produced the HIA has struggled to find a way to achieve some level of protection for cultural heritage, while at the same time finding ways to make mining development in the Limpopo region possible (as amply stated by HIA team leader Prof. Innocent Pikirayi during the visit at Vele Colliery on January 18). From the mission team point of view however, the report pushes this agenda too far, as exemplified by the following passage on page 43:

*” ... mining, if done within a compliance framework represents an opportunity to document some of the World Heritage’s OUV. Mines have resources which make it possible to sustain and manage sites.... “.*

The mission agrees that any form of exploitation can result in the discovery of archaeological sites by accident, which may contribute to generate new knowledge. However, large scale open cast mining should not be presented as a fruitful way to preserve OUV of World Heritage Sites or to gain knowledge about the past. Such statements may diminish the legitimacy of the HIA and call its objectivity into question.

Overall the HIA does not offer reassurance that the impacts of the opencast mining can be mitigated.

For the underground mining areas the HIA suggests that cultural heritage sites could be protected from vibration impacts, if this underground mining takes place at a sufficient depth. Since coal mining must always take place at the depth where the coal seam is situated, the HIA should have presented information about the depth of the planned underground mine, as well as the properties of the rock between the coal seam and the surface and thereby the stability / fragility of the ground and the possible risks for cave-ins after the coal seam have been removed. The report should also have discussed which mining methods Coal of Africa will use, in particular how the company will secure the roof of the mine. This information is available in the EIA, where the company states that they will use board and pillar methodology and that they intend to leave pillars in order to secure the roof. In addition, during the reactive monitoring mission visit to the Vele Colliery on January 18, the mission team was able to acquire this information straight from representatives of Coal of Africa. The HIA should have contained more exact information on these issues in order to ascertain potential impacts and mitigation measures

Another point of critique is the fact that the HIA fails to provide a 3-5 years long monitoring programme as required by the Terms of Reference, in answer to the recommendations submitted by the monitoring mission report 2010 in the framework of the decision 34 COM 7B.52.

#### **2.3.4 Buffer Zone**

On the matter of the buffer zone, the mission team would like to draw attention to the fact that the HIA report states that the World Heritage Committee in its 2010 SOC Report did not acknowledge that a Buffer Zone had been approved by the State Party in 2009. This is because the Buffer Zone has never been presented to the World Heritage Committee for approval in terms of whether it is adequate to protect the property. This point is noted in the Retrospective Statement of OUV under Protection and Management Requirements. It is therefore imperative that the State Party submits before the 36th Session of the World Heritage Committee, the official buffer zone, in order to comply with the request of the World Heritage Committee (Minor Modification Boundaries). The mission recommends that the 2009 adopted buffer zone should be increased to incorporate the land east of the core area that was described as buffer zone at the time of inscription in 2003. As a first step, the 7 km stretch east of the core area up the border of Vele should be incorporated. Likewise, the mission emphasizes that any reduction of the buffer zone is totally unacceptable.

### 3. Conclusions

#### 3.1. Resumption of mining

The mission was able to confirm that mining had been resumed in the open cast mining area at Vele colliery where the company was working in 2010 when mining was officially stopped by the South African government. The company told the mission that it was aiming for full production in this area by 1<sup>st</sup> March 2012. It appears that work on the processing plant had been continued in 2010 and 2011 and was 95% finished by November 2011.

#### 3.2. Open cast and Underground Mining areas

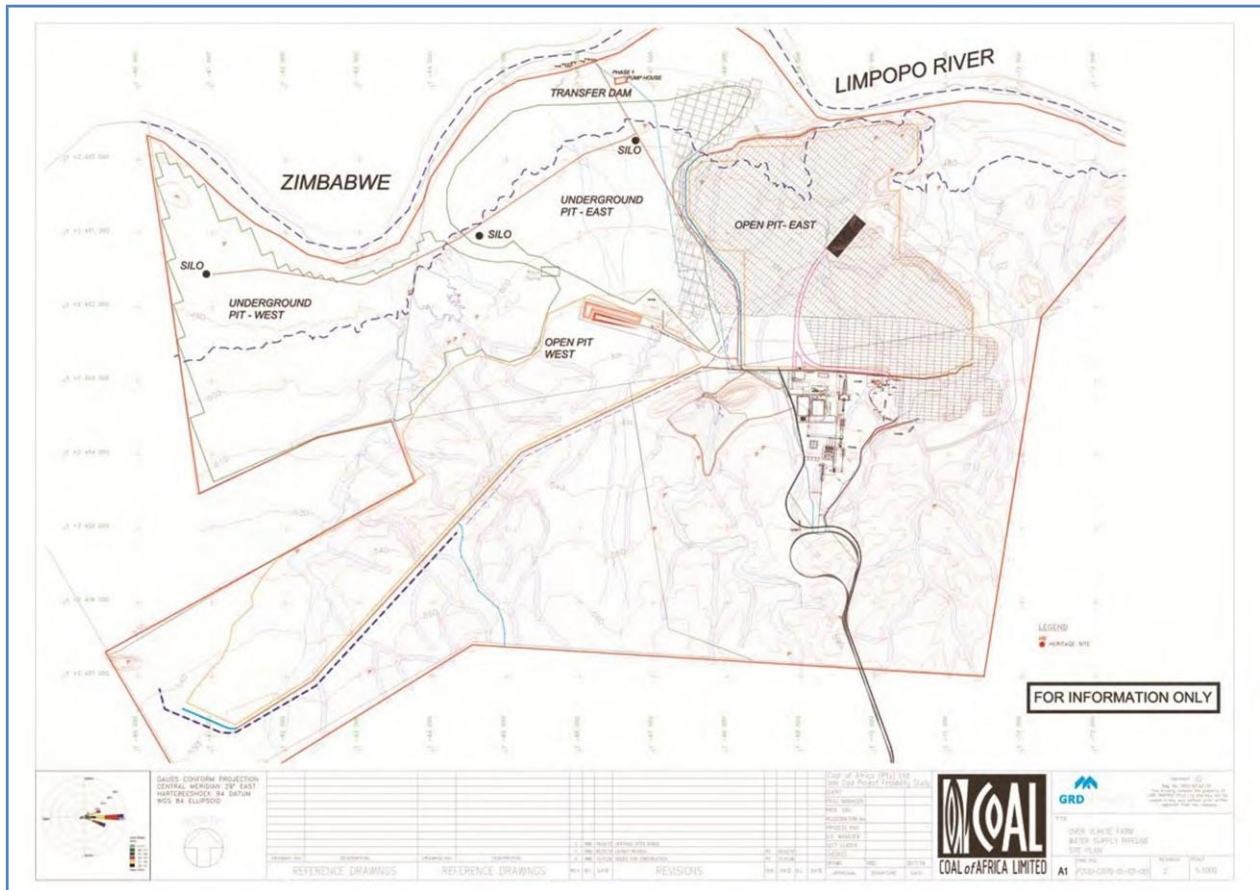


Figure 26. Map of the mining plans of Coal of Africa at Vele. Map: Coal of Africa.

The proposed mining operations, as set out on maps of the mining site, and confirmed in discussion during the mission, show that the mining will be opencast in the south-western and eastern parts of the area (indicated as “open pit east” and “open pit west”) and underground in the north-west (indicated as “underground pit west” and “underground pit east”). When asked for the rationale for this distinction between the two areas, the Chief Engineer of the mining operations, Riian Van der Merwe, confirmed that there are no technical reasons as the coal seam is in the same position underground across the



whole area. The reason why Coal of Africa are choosing to mine underground near the Limpopo River in the north-west is to protect the large commercial citrus farms in that area, which would be destroyed by open cast mining. As they see no economic interest in what they called the 'dry bush land' over the rest of the site, they are choosing to undertake opencast mining in those areas. It is thus apparent that Coal of Africa could certainly mine underground across the entire site. They are not planning to do so as it is more profitable to mine open cast. However this approach does not confirm the stated aim of the company to protect the landscape.

### **3.3. Impact of the mining of the OUV of the property**

The HIA undertaken by the State Party considered the potential impact of the mining, both opencast and underground, on the World Heritage site. Although this was a detailed study, it had not been underpinned by the Statement of OUV agreed by the World Heritage Committee, and thus had not considered a detailed list of attributes that convey OUV. As a result, the HIA had focused on specific archaeological sites within the mining site without a clear understanding of how they relate to each other in landscape terms or how they relate to the inscribed cultural landscape area. The conclusion drawn by the HIA was that any sites within the opencast mining areas could be destroyed once they had been recorded and that in this way, or fenced off within the area of the processing plant, knowledge of them could be recorded. The mission considered that protecting individual sites or undertaking rescue archaeology on individual sites in advance of open cast mining did not equate to the mining operations having 'minimal impact' as set out in the HIA. Once the open cast mining had finished in a particular area, any archaeological sites, or graves of ancestors would have been destroyed, and the re-filled areas would be 'coal mining' landscapes and not cultural landscapes associated to the sites of the K2 and Mapungubwe period cultural landscapes in the inscribed property, or landscapes of value to the local communities.

As well as the major devastation to the landscape that the opencast mining would bring, there are other impacts from the processing plant, an air strip and access roads to the western open cast mining areas. The mission noted other interventions within the landscape, such as a circular clearing, but its purpose was not clarified. Of these the road and the trucks using it which could be as high as one every 1.75 minutes once the mine is in full production, would cause the greatest threat to the sense of place of the area.

There is also reason for concern in terms of the water requirements for open-cast mining in an area that already has water shortages.

By contrast with the opencast mining areas, the underground mining areas could interfere far less with the landscape and be mitigated if appropriate processes were put in place to reduce vibration, for the necessary ventilation and escape routes, and to support the roof.

The major threat to the setting of the inscribed property is thus the open cast mining process. In the view of the mission this would be unacceptable in terms of its impact on the landscape setting of the inscribed property and for the way it would jeopardise the cultural continuum between the landscape

within the property and that in its setting. Furthermore given the extent of the coal seam under the buffer zone, there is potential for huge swathes of land around the property to be irreversibly damaged in a similar way.

### **3.4. Possible Mitigation Measures**

It is the view of the mission that no mitigation measures are possible to reduce the impact of the open cast mining. It does not accept the view put forward in the HIA that recording archaeological sites in advance of destruction can be said to safeguard the landscape.

In order to mitigate the overall impact of mining, the mission considers it essential for all mining to be underground, with appropriate safeguards related to structural stability and vibrations.

In relation to underground mining, detailed arrangements for the extraction of water from the Limpopo River and for the provision of electricity would need to be agreed to mitigate the impact of the necessary infrastructure. There will also be a need to mitigate the impacts of the large number of coal trucks travelling to Musina, the transport hub.

Any underground coal mine will also need escape routes in case of accidents as well as ventilation openings in order to get rid of gas and coal dust. There will need to be stiff rules on how escape- and ventilation openings could be designed in order to mitigate impacts on the landscape.

Furthermore in order to put in place appropriate mitigation measures related to the impact of roads, plants and vibration from underground mining, and to facilitate future monitoring, it will be necessary for more detailed surveys to be undertaken on the overall Iron Age landscape features, and of sacred features associated with local communities.

### **3.5. Relationship with local communities & NGOs**

The mission noted that leaders of local communities felt excluded from consultations over the mining approvals, that their concerns had not been acknowledged and that they have not had any chance to influence the process. Indeed overall they considered that they had not been consulted. NGOs considered that they had not involved in the processes in a formal and open manner, nor been provided with adequate information.

### **3.6. Protection of the setting of the property and the effectiveness of the buffer zone**

The HIA recommended that the Buffer Zone be reduced in size. The Mission did not agree with these proposals and indeed consider that the buffer zone (as gazetted in 2009) needs to be increased to encompass the area to the east of the property which was indicated as buffer zone at the time of inscription in 2003. A first step must be to include the area between the eastern border of the Mapungubwe cultural landscape core area and the western border of the Vele mining area. The Buffer Zone also needs to be approved by the World Heritage Committee in terms of its delineation and the protection it offers. In terms of the latter, clear policies related to mining need to be set out.

### **3.7. Further threats from mining activities in the Buffer Zone**

The mission is concerned that the HIA has revealed a large number of applications for prospecting rights in the current Buffer Zone, some of which have been approved. Around twenty of these relate to the coal seam that runs south-west from the Vele area under the Buffer Zone. Future coal mining areas have been delineated and farms purchased by Coal Mining companies. It was reported to the Mission that several companies are carefully monitoring the development of the Vele colliery project. This reinforces the need for clear protection policies within the Buffer Zone which prohibit mining both open cast and underground.

### **3.8. Mining infrastructures within the property**

The Mission was made aware of several large installations in the northern part of the property that are related to the de Beers Venetia diamond mine on the south of the property. These installations provide the mine with water from the Limpopo River. These have a substantial adverse visual impact.

### **3.9. State of Conservation of the property; K2 site and water extraction plants**

The mission noted that whereas the Shroda site and Mapungubwe Hill appear to be in a reasonable state of conservation, the K2 archaeological site is seriously deteriorated putting at risk the major source of archaeological evidence for the time when the centralised state emerged.

## **4. Recommendations**

4.1. As it is the view of the mission that no satisfactory mitigation measures are possible to reduce the impact of the opencast mining on the property's OUV, it does not share the view put forward in the HIA that recording archaeological sites in advance of destruction can be said to safeguard the landscape.

4.2. Taking into account the assurances given to the mission that there are no technical reasons why Coal of Africa could not mine underground across the entire Vele Colliery site, instead of only near the Limpopo River as currently proposed to protect the citrus farms, the mission considers that there is an alternative to opencast coal mining. If opencast mining is pursued, it would irreversibly damage the setting of the property in terms of the way it supports the cultural landscape of Mapungubwe. Therefore the mission recommends that opencast mining operation should be reconsidered at Vele Colliery after the current existing footprint is mined out. Thereafter, as an exceptional measure, future mining operations in the vicinity of the buffer zone should be carried out underground.

4.3. Underground mining may pose greater risks to employees working underground, which naturally mean that proper safety measures must be put in place to protect their safety, such as proper pillars, ventilation systems and escape routes. When constructing those ventilation systems and escape routes – and any other supporting infrastructure – it will be necessary to



first investigate, then mitigate and thereafter monitor their impacts on the cultural landscape. It will be of crucial importance to safeguard the long-term stability of the underground mines, not only when they are in operation but also after they are abandoned, in order to make sure that there are no cave-ins and subsequent formation of cracks and depressions in the landscape.

4.4. In paragraph 11 of decision 35 COM 7B.44, the World Heritage Committee “*Calls upon the Director-General of UNESCO, in consultation with the Chairperson of the World Heritage Committee, in the event of the mission concluding that the heritage impact assessment indicates that the proposed mining would not threaten irreversibly the property's Outstanding Universal Value, to consult with the State Party, in line with the provision of Decision 35 COM 7.2, paragraph 6, on any urgent mitigation measures and monitoring programmes that might be requested before mining operations were to commence*”. Paragraph 6 of decision 35 COM 7.2 sets the situations where exceptional initiatives can be taken by the Director-General of UNESCO in consultation with the Chairperson of World Heritage Committee, regarding actions to be taken in place in between two Sessions of the World Heritage Committee.

4.5 For this specific case, the mission team advises the Director-General of UNESCO, that it is not possible to recommend satisfactory mitigation measures that could be put in place to ensure that the current authorized mining proposals do not impact adversely on OUV.

The mission further advises that the Director-General, after consultation with the Chairperson of the World Heritage Committee, writes a letter to the State Party to inform them of the outcomes of the mission and that the mission recommendations related to the reconsideration of the mining processes will be put before the World Heritage Committee for its decision.

4.6. In order to allow the establishment of a detailed monitoring programme, the HIA needs to be augmented through a detailed site survey of the overall mining area. This survey should be undertaken by professional archaeologists who are clearly independent of Coal of Africa, and in cooperation with community representatives.

4.7. The Buffer Zone needs to be extended to the east of the property and the revised Buffer Zone, with details of protective policies, should be submitted to the World Heritage Committee for approval

4.8. The revision of the Management Plan should be used as an opportunity to involve fully community representatives in the management of the property through the establishment of a Mapungubwe Management Committee.

## 5. Detailed Recommendations

### 5.1. Secure the buffer zone

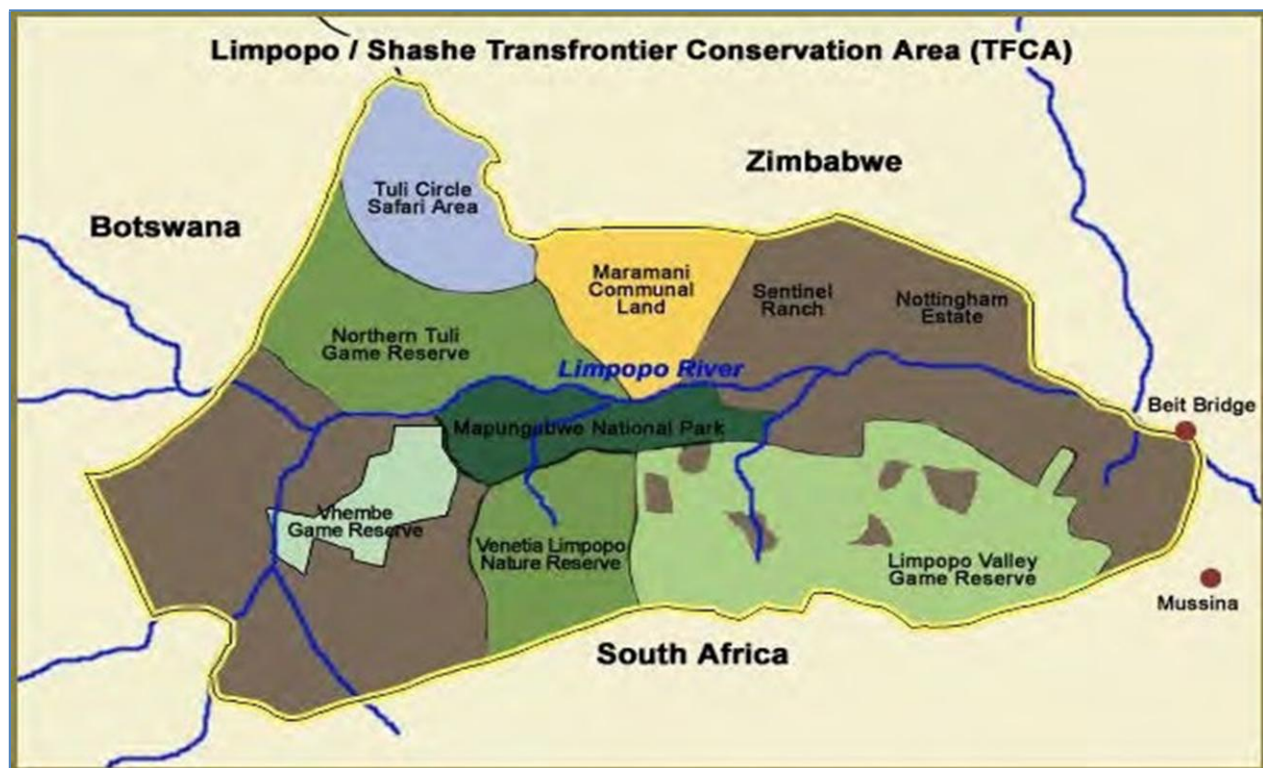


Figure 27. The proposed buffer zone (in South Africa and the larger TFCA) originally defined in the nomination dossier examined in 2003. This is the extent of the buffer zone still considered by the World Heritage Committee.

The definition of the buffer zone in the HIA is based on the buffer zone gazetted by the South African government in 2009. ICOMOS and the WHC bases their interpretation of the buffer zone on the requirements said in paragraph 104 of the Operational Guidelines. Therefore the mission team is concerned by the recommendation of the HIA to reduce the extent of the buffer zone. **It is our view that the buffer zone needs to be expanded – not decreased.** This expansion should take place in the area east of the Mapungubwe cultural landscape core area, as already stipulated in the 2010 WHC-ICOMOS mission report. In other words, the mission team re-state the importance of the concern already formulated in paragraph 8 of decision 35 COM 7B.44:

“Express its concern that the buffer zone and the proposed greater TFCA, as was envisaged at the time of inscription to protect the property within South Africa, have not yet been completed as a result of the slow pace of land acquisition, thus continuing to leave the area east of the property unprotected.”

### 5.2. The issuing of new prospecting licences in the buffer zone of the Map.CL. WHS

The mission team is concerned that the HIA has revealed that more mining companies have applied for, and in some cases have received prospecting rights in the buffer zone south of the core area of the

World Heritage site. Therefore, further clarification from the State Party on its policy on mining in and around the World Heritage sites' buffer zones. The Department of Environmental Affairs needs to engage in a consultation with the Department of Mineral Resources in order to stop further licensing of prospecting and mining rights in and around the property's buffer zone.

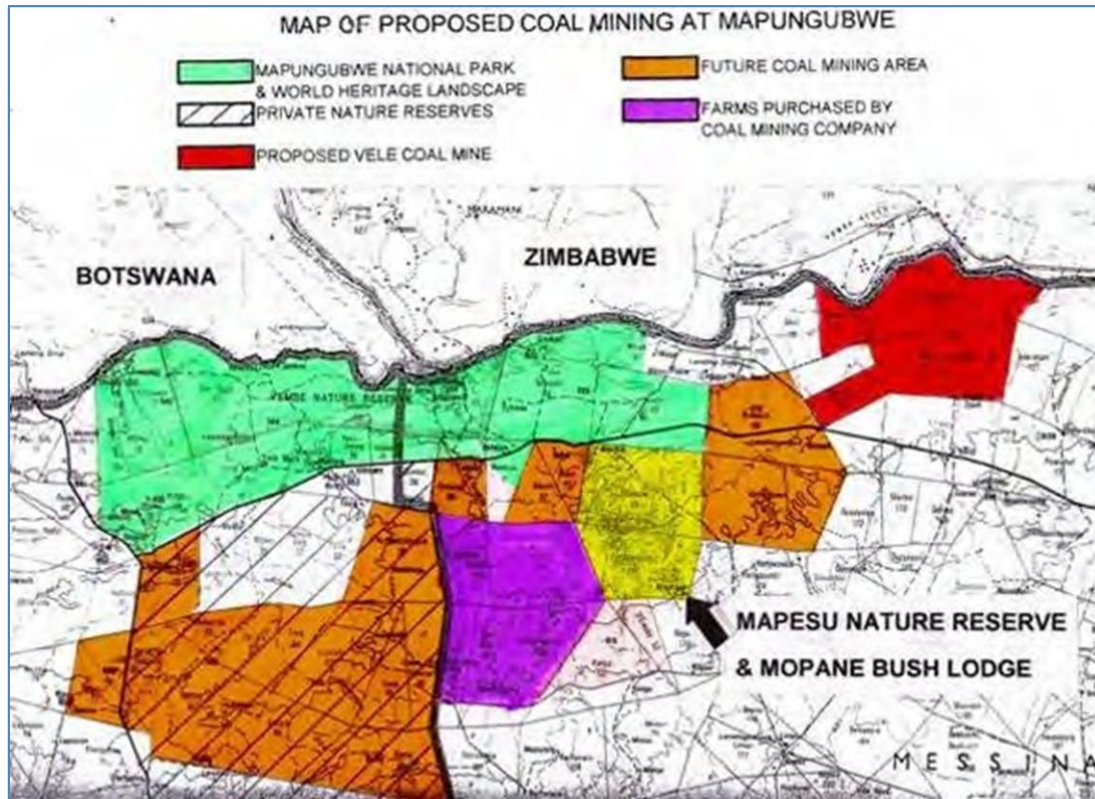


Figure 28. Map showing proposed new coal mining areas in the buffer zone of Mapungubwe Cultural Landscape World Heritage site.

### 5.3. Ensure that local communities are consulted and included

WHC and ICOMOS are concerned that the local communities in the area question the validity of the HIA and express a feeling of not having been consulted. We recommend that the preparation of the revised management plan be used as an opportunity to fully involve community representatives in the management of the property. The mission team suggests the establishment of a Mapungubwe management committee in which the local communities should have proper influence on the decision. In addition, the mission suggests that community leaders are invited to take part in a new survey of archaeological sites within the Vele colliery area, in order to ensure that cultural remains of significance to these communities are properly registered and safeguarded.

### 5.4. A comprehensive 3-5 years monitoring program

Although the mission recognizes that the HIA contains some suggestions on monitoring, it considers that a more detailed monitoring programme is needed based on more detailed field surveys that identify how the archaeological sites and landscape are associated with the OUV of the property. This monitoring



program must include a careful monitoring of the currently on-going open cast mining operations and – after these operations have stopped following the recommendations of this report – a continued careful monitoring of underground mining operations, associated infrastructures and processing plants. In addition, the program must include careful monitoring of all rock-art sites in the core area of the Mapungubwe cultural landscape as well as in the buffer zone.

The mission is informed that a Memorandum of Agreement (MoA) was signed between the Department of Environmental Affairs and Coal of Africa. This MoA could be the basis for the creation of a Foundation for the conservation of Mapungubwe c cultural landscape World Heritage site. The Executive Director of Coal of Africa, Mr John Wallington, has expressed its readiness to contribute to such a foundation and also to mobilise other interested private companies such as De Beers (Venetia). The main purpose of the Mapungubwe foundation would be to fund the implementation on the 3-5 year monitoring programme, as well as the activities contained in the revised management plan to be submitted by the State Party.

## 6. Appendices

### 6.1. Comments on Heritage Impact Assessment by the Association of Southern African Professional Archaeologists (ASAPA) on 30 January 2012

Comments on Heritage Impact Assessment by the Association of Southern African Professional Archaeologists (ASAPA) on 30 January 2012

#### 1. Introduction

1.1. ASAPA recognises that the Heritage Impact Assessment submitted to UNESCO is more thorough than previous attempts. This is encouraging. We, however, still have a few major concerns. These are outlined below. Our comments are general and clustered according thematically. We do not provide a detailed page by page critique, but rather engage with the broader content. In a few cases specifics are pointed out, but this is not exhaustive.

1.2. Before proceeding to the comments, ASAPA notes with regret that in spite of requests to the state party and CoAL, ASAPA did not receive a copy of the full revised Heritage Impact Assessment (HIA) before the meeting with UNESCO on the 20th of January 2012 at Dongola Ranch, and thus we were not able to provide comments on the document to the meeting. Consequently, ASAPA undertook to provide written comments to UNESCO.

1.2.1. In spite of being alerted to the fact that ASAPA (and the Mapungubwe Action Group) had not received copies of the HIA, and noting that ASAPA committed itself to providing written comment in the meeting with all parties present, neither the State party, nor CoAL, supplied ASAPA with copies of the revised HIA after the meeting. The copy of the HIA on which these comments are based was handed to us by UNESCO representatives after the meeting at Dongola ranch.

1.3. ASAPA notes with delight that the Archaeological Impact Assessment (AIA) Report (Appendix 8) acknowledges that the ancient Mapungubwe Cultural Landscape (MCL) is bigger than the Mapungubwe National Park (MNP) and World Heritage Site (WHS), and that sites associated with the MCL will be impacted on by the Vele development.

1.4. ASAPA notes that the Mapungubwe coalition was verbally informed by Prof. Van der Riet that the starting point of this HIA was that the mine will go ahead.

1.5. As indicated by the MOU submitted to UNESCO by CoAL, ASAPA is engaged in negotiations with CoAL Africa. The outcome of these negotiations might include applications for authorisations as well as improvements to the EMP, mitigation measures and offsets. We also hope to 'raise the bar' for all possible future mining operations in the MCL and surrounds.

1.6. In spite of this pragmatic step ASAPA remains opposed to the industrialisation of the MCL.

1.7. ASAPA previously commented on a draft version of the HIA that did not include any of the Annexures. In cases where we feel our concerns have not been addressed we repeat our comments on the draft version here.

## **2. General remarks**

2.1. ASAPA welcomes the mapping of the various impacts, threats or potential impacts, and sees this as a step in the right direction.

2.2. We, however, suggest that there is a disjuncture between the recommendations made in the revised HIA and the specialist studies conducted. In particular, the AIA only assesses the impact on sites on the Vele property, and the Historical study focuses only on people who have claimed links to medieval Mapungubwe. They, however, do not provide a sound foundation for some of the more general conclusions and recommendations.

2.2.1. If recommendations are to be made about the whole MCL beyond the Vele property as part of the current process, a full study should be conducted for the whole MCL at the cost of CoAL of Africa. This should include a cumulative impact assessment of the potential impact of all the proposed industrial and other developments in the MCL.

2.3. We also note that the report, whilst expanded, still does not include a full assessment of living and intangible heritage of the properties on which Vele colliery is situated.

2.4. We would have liked to see more integration of the individual specialist reports into the overall HIA.

## **3. Impact on Sense of Place and Outstanding Universal Values (OUVs)**

3.1 The definition of “sense of place” used is certainly valid. It should also be noted that at least one component of the sense of place in the vicinity of Mapungubwe does in fact relate to the natural values and the tranquillity of the area as it is these factors that are likely to attract eco-tourists and thus help sustain the MCL WHS as a destination within South Africa. At the moment, it is possible that there may soon be far more than one mine in the area – how is this sense of place likely to be affected by the large-scale industrialisation of the area?

3.2. It is a mistake to consider Mapungubwe’s sense of place as a present-day phenomenon. Among other things, Mapungubwe is a WHS because the physical landscape is still relatively unaltered. Mapungubwe is not unique because of how local people feel about it now, but because of what happened there in the archaeological past. We know from research that Zhizo/ K2/ Mapungubwe communities utilised the physical landscape for agriculture and field camps, grazing and cattle posts, ritual and residences. All these sites contribute to the landscape and sense of place. While the MNP and present buffer zone contain evidence for much of this activity, the MNP only incorporates one half of the main agricultural system (i.e. vleis cultivation).

3.3. Downstream floodplains lie outside the MNP in the area of the Vele mine. Much of the evidence for this activity has been damaged by commercial agriculture. This is why the mine area is important.



3.4. For these reasons, a new mine that alters the physical environment of the 10th -14th centuries landscape is a concern.

3.5. In this regard, coal mining is more of a problem than diamond mining. With diamonds, the product can be taken out in a suitcase, while coal has to be transported in trucks, conveyer belt or by rail. Moreover, cumulative disturbances can make matters worse. Other mines are quite likely to follow Vele colliery, particularly if the buffer zone is contracted.

3.6. It is thus premature to claim that the new mine will not affect the MCL; the ancient landscape was bigger than the present MNP.

3.7. We also disagree with the interpretation of the nomination that only the period AD 900 to 1300 is of concern in the nomination. Instead the nomination throughout referred to the cultural landscape as a whole, and repeatedly returned to the complexity of the occupation sequence.

3.8. We also are astounded that this it is implied (illustrated for example in Figure 11) – in the face of substantial archaeological research in the area that demonstrate the opposite e.g. Van Doornum 2005, 2008, 2009 – that the stone age material and rock art does not date to the period AD 900 to AD 1300. It has been conclusively demonstrated that the farmers did not displace MCL hunter-gatherers in AD 900, and that they coexisted in the MCL for a substantial period of time.

3.9. Furthermore, threats to other resources such as rock art, Stone Age and Late Farming Community (Iron Age) sites, and the natural environment, may undermine the authenticity of the cultural landscape, the sense of place, and the interaction of human values within which the Mapungubwe sites developed and should therefore also be identified and managed.

3.10. ASAPA is perplexed by the claim on page 13 that the current threats are the same as at the time of nomination. At the time of nomination there was not a colliery on the doorstep of the MCL WHS, nor had prospecting licenses been granted to more than 20 companies in the MCL buffer zone, nor was gas exploration permitted.

#### **4. Buffer Zone**

4.1. We strongly agree with the risk assessment vis-a-vis the lack of clarity regarding the buffer zone between the MCL WHS core area and the proposed Vele mine, and the need to have these issues clarified as soon as possible. The buffer in this area is at best murky.

4.2. ASAPA, however, asserts that the rest of the buffer zone is well defined. It was first gazetted for comment on 18 December 2007 in the Government Gazette No 1200. The subsequent gazetted declaration - World Heritage Convention Act, 1999 (act no. 49 of 1999), as Gazetted in the Government Gazette no. 31832 (71) - brought the MCL WHS into being in terms of South African legislation on the 30th of January 2009.

4.3. ASAPA strongly asserts that any attempts to redefine the buffer zone cannot involve the shrinkage of the existing buffer.

4.4. We suggest that instead of contracting the buffer it should be expanded in the eastern area between the MCL WHS core and Vele mine, where there is no gazetted buffer in terms of South African legislation.

4.5. On page 8 of the revised HIA it is stated that: “There is no consensus regarding the meaning, purpose, nature and in some cases extent of the buffer zone of the MCL WHS. Various institutions, I&APs and other stakeholders have different ... Conceptualisations of what constitutes such a buffer zone (Refer to Annexure 7).”

4.5.1. ASAPA contends that the current different “conceptions by stakeholders” is insufficient reason to shrink the buffer zone declared in terms of South African legislation.

4.5.2. Also, we note that enactment of the declaration in terms of South African law was done in terms of the World Heritage Convention Act. This means that the intention of the declaration by Minister Van Schalkwyk was clearly based on the internationally accepted World Heritage Committee definition of the buffer zones, and the protection this implies. This conclusion is further supported by the inclusion of WHSs as protected areas in terms of the Protected Areas Act.

4.6. ASAPA welcomes the recommendation on page 8 that no mining should take place in the buffer zone.

## **5. Community consultation**

5.1. Based on the input from an ASAPA member with extensive experience in working with communities in the context of mining, ASAPA asserts that the views expressed in the HIA regarding communities and mining is certainly not the norm. South African communities frequently have seen very little economic improvement from mining.

5.2. ASAPA finds it extremely problematic that the authors have decided on behalf of the community/ies that the mine will be to their benefit.

5.3. Our advisor found it problematic that the authors of the report accepted it as a given that mining is to the benefit of local communities. In fact, in several cases the standards of living of local communities have been negatively affected, and in many other mining areas local water sources have been severely impacted on and new schools and clinics stand empty.

5.4. We are also perturbed by the assumption that the tribal authorities enter into agreements that always benefit their communities. Studies on communities displaced by mines have overwhelmingly shown that this is not the case. But it is not immediately clear whether anyone will be directly impacted by the mine. Again, the study should reflect on this.

5.5. The report also fails to consider the very unequal power relations that exist between the mine and the communities. Who will stand as arbiter on behalf of the communities to ensure that social responsibilities are met?

5.6. Lastly, the authors fail to reflect on repeated examples of community break down caused by ill-considered deals that do not include all community members. Communities need to be included in decision making processes so that they can make informed decisions.

5.7. ASAPA also queries what steps will be put in place to monitor and ensure the successful community development. What firm commitments are in place?

5.8. ASAPA is convinced that this HIA needed to reflect on whether the communities have been fully informed of their options; their rights to their heritage; the impact and implications of mining on their well-being; and that these communities were able to make a considered decision about their own future AND that mechanisms are in place to enable them to participate in decision-making.

## **6. Unauthorised damage to site**

6.1. ASAPA notes with very deep concern that the revised HIA indicates that Sites 12, 13, 18 and 34 are already being impacted on. As far as ASAPA is aware these impacts have not been permitted by SAHRA, and thus are illegal. This does not bode well for compliance with legislation in future.

6.2. We again draw CoAL Africa's attention to Section 35 (4) of the National Heritage Resources Act (NHRA), no 25 of 1999. In terms of which "No person may, without a permit issued by the responsible heritage resources authority—(a) destroy, damage, excavate, alter, deface or otherwise disturb any archaeological or paleontological site or any meteorite; (b) destroy, damage, excavate, remove from its original position, collect or own any archaeological or paleontological material or object or any meteorite;....(d) bring onto or use at an archaeological or paleontological site any excavation equipment or any equipment which assist in the detection or recovery of metals or archaeological and paleontological material or objects, or use such equipment for the recovery of meteorites".

## **7. Stakeholder engagement**

7.1. We reiterate the point made on the draft revised HIA that South African legislation requires that detailed proof of stakeholder consultation be provided.

7.1.1. For example, it is noted that on page 34 and 35 of the HIA that interviews were carried out with a range of persons. Detailed information on the date, place, individuals and content should be provided. On page 29 it is stated that the Universities of Cape Town and Pretoria were consulted. Does this refer to informal conversations with the consultants who are from those institutions, or were formal open meetings held at those institutions? If meetings were held, the date of the meeting, a list of attendees and a summary of the discussions should be provided.

7.2. It is noted that during the stakeholder engagement process (Annexure 7, p. 4) a series of questions were put to members of local communities. There does not seem to be any full report on the answers to these, particularly to those questions relating to the existence of intangible heritage.

7.3. Extensive reference is made in the revised HIA (e.g. page 29) of very wide consultation with NGOs, Action Groups and Trade Unions. This is not reflected in the detailed schedule and we strongly advised that the two documents should be aligned.

7.4. ASAPA also notes that the HIA report and Annexures are not very specific on the nature of contact with the stakeholders, in particular a very short table of specific consultation is provided on page 13 to 15. This includes very few registered Interested and Affected Parties (I & APs).

7.4.1. Consequently, we request that the report reflects (possibly in tabulated format) how many of the 365 registered I&APs (as reflected in the Vele EMP) were consulted, and the date and nature of such consultation.

7.4.2. If the registered I&APs were not consulted the report should explain why they were not consulted. ASAPA raises this matter because several registered I&APs have indicated that they have not been consulted regarding the HIA. These might, however, be minor omissions rather than trends, but this is impossible to assess in the absence of detailed information.

7.4.3. In particular, ASAPA requests that the report reflects on the nature and extent of consultation on this HIA with the Endangered Wildlife Trust, BirdLife South Africa, Wilderness Foundation South Africa, Peace Parks Foundation, World Wide Fund for Nature South Africa and Mapungubwe Action Group, with which CoAL has signed a memorandum of understanding. Consultation with these parties is particularly relevant because these parties have contested the environmental baseline data, such as biodiversity and dust, on which this report is based. This is not reflected in the report.

7.5. Furthermore, ASAPA feels that the revised HIA does not make it explicit if the stakeholders consulted in the drafting of the HIA were registered I&APs. The current format of Annexure 12 makes it difficult to assess this (see suggestion below). If stakeholders were consulted who are not registered I&APs a separate list indicating their details should be attached.

7.6. On a related matter ASAPA suggests that instead of listing only names and contact details for stakeholders in Annexure 12, the list should also reflect affiliation (see the format used in Annexure N1 of the Vele EMP). We feel that it is important to reflect on the affiliation of I&APs, because the current format makes this data very difficult to evaluate the extent of participation.

7.7. Annexure 7, page 13 lists SAHRA as a professional body. Obviously, this is incorrect. This resonates with the concern that ASAPA raised i.t.o. the draft revised HIA that the legal decision-making status of SAHRA is still not fully recognized. SAHRA is an "organ of State" tasked with the protection of national heritage resources in terms of the NHRA. We feel it is crucial to recognise that:

7.7.1. SAHRA was established in terms of the NHRA 4 d) " ... to manage the national estate and makes provision for the establishment of provincial heritage resources authorities to manage provincial and local heritage resources."

7.7.2. Furthermore, SAHRA is to co-ordinate the identification and management of the national estate, as set out in NHRA S13 (b) SAHRA is to "co-ordinate the management of the national estate by all agencies of the State and other bodies and monitor their activities to ensure that they comply with national principles, standards and policy for heritage resources management; (c) identify, record and manage nationally significant heritage resources and keep permanent records of such work;"



## 8. Missing / insufficient data / studies

8.1. The brief of this team included to “Compile an HIA report that has the following components: I. Archaeology – Stone Age, Iron Age, Rock Art; II. Palaeontology; III. History or Contemporary History (some as represented by historical graves and settlements) and IV. Living heritage and intangible heritage”.

8.2. We reiterate our concern raised regarding the original EIA, and we contend that this report does not seem to address the latter two components, History or Contemporary History and Living heritage and Intangible Heritage. Since these are also integral to any understanding of the Outstanding Universal Value of the site, we are not sure why they are not discussed in full. This assessment of the intangible values should in addition to the focus on the descendant communities examine the values of the MCL for the nation as a whole.

8.3. The historical study only aims to “provide insight into the history of various communities that occupy the area (northern and eastern parts) of Mapungubwe. The report largely draws from a literature review also shared history of occupation, migration and cultural practices”, rather than specific interviews with people living in the area, or who have lived in the area in the past.

8.4. Our concern raised during the original EIA, and draft of this document still stands and that is that this team surprisingly did not include a Stone Age specialist. This unfortunately means that there is still a gap that this new revised HIA should address.

8.5. Irrespective of the value placed on sites from different periods in the nomination document, a thorough HIA as required by SAHRA and NEMA should contain a full assessment of these aspects, by specialists in these fields. As communicated to all ASAPA members in August 2009, SAHRA informed members of the ASAPA executive that they would like to see heritage impact assessments carried out by multi-skilled teams with the appropriate credentials. In addition, this has been one of the major critiques and shortfalls of the original HIA. If this subsequent HIA is supposed to address these deficiencies it is not clear why this approach has not been enacted.

8.6. Names of consultants who undertook the surveys / interviews must be included. Where relevant, such as in terms of the survey, their ASAPA CRM accreditation levels should be reflected.

8.7. Please note that it is ASAPA's understanding that any stand-alone HIA has to be circulated for public comment.

8.8. The Paleontological assessment that is referred to was done at a desktop level, we are not familiar with the recommendations and results in the paleontological report but would have thought that a field study was necessary as part of the HIA.

## **9. Comments on the study Historiography and Traditional dispensation of Mapungubwe: Vele Colliery and surrounding communities.**

9.1. ASAPA sent the historiography report to an academic historian for comment. He advised that this report is weak and in need of major revision.

9.2. Noting that this is a specialist report, we suggest that it should be sent for peer review by historians and social anthropologists. These comments could help to improve the report.

9.3. Noting that we are not specialists in this field, ASAPA is not in the position to provide substantial comments, but we note that:

9.3.1. The authors fail to reflect on the history of power imbalances in the area, and on the history of displacement brought about by National Parks/the army, etc. These factors will impact on the communities' ability to discern between sound business proposition and vacuous promises.

9.3.2. An area of concern is the exclusion of the historical developments since medieval Mapungubwe, which might be of great concern to the communities in the region, or those displaced by Apartheid government actions / policies in the 1900s, as it directly relates to their histories in the area.

9.4. This specialist study omits key data sources including:

9.4.1. The comprehensive study conducted by Profs Caruthers and Bonner for the WHS nomination process.

9.4.2. Oral histories recorded in the documents related to the numerous restitution land claims and land claims decisions in the area.

9.4.3. Published ethnographic and oral accounts collected in the 1930s by members of the Mapungubwe research team.

## **10. Documents consulted**

10.1. We again indicate that the list of references only lists the ASAPA appeal to the Mining Right. There is a host of additional information that is contained in subsequent legal documents – the EMP appeals, the various replies as well as the interdict application and the replicating affidavits from each side. Perhaps these should also have been consulted.

## **11. Technical comments**

11.1. Page 8. point 6 states that “The broader MCL extends to the neighbouring countries i.e. Botswana, Zimbabwe and some areas in South Africa outside the gazetted National Park. Mining activities are either taking place or have been licensed in all these areas and these activities may pose a threat both directly and indirectly to the individual elements of the cultural landscape. Whilst the State Party is making tremendous efforts to regularize such activities, however, with full compliance to local legislation and effective monitoring, the impacts can be minimised.”

11.2. This could imply that mining may go ahead in the MCL because impact can be minimised. ASAPA contends that mining should not be allowed in the MCL WHS buffer zone, and thus we are concerned by the claim that impacts of mining “can be minimised”.

11.3. It is important to note that in terms of the NHRA, mitigation would include all significant archaeological sites impacted on, irrespective of their affiliation or date. This includes Stone Age and historical sites.

11.4. ASAPA does not agree with the conclusion that the impact on MCL sites outside the WHS on the Vele property will be 'minimal' (HIA page 7). Sites in the east and west pits and related infrastructure will be destroyed. Mitigation is simply a measure to rescue research potential before destruction / damage.

11.5. ASAPA is surprised that the threats to biodiversity map (Fig. 17) does not include the proposed Mlilo coal fired power station, gas exploration or potential coal mines in the buffer zone (where more than 20 prospecting rights have been granted).

11.6. We also are not clear what data sets were used in the assessment of the threats to biodiversity.

11.7. Our reading of Figure 20 is that the MCL is under intense threat.

11.8. On p. 23 it is said that “there are several mining claims”, it is our understanding that there are a great deal more than “several” mining and prospecting claims in the vicinity. We would like to see some consideration in this report of what you think the cumulative impact of numerous mines will be on the OUV of the WHS, independent merely of the impact on individual sites.

11.9. The sites with graphite decoration most likely belong to the Khami period.

11.10. The information about sites 27 and 28, sites 29 and 30 is still missing.

11.11. Finally, ASAPA is advised that any site with features, such as grain bin foundations, middens or kraals require mitigation.

11.12. The co-ordinates also are of concern as they should relate to grave sites that have to be plotted for clear identification.

11.13. What is academic research as set out in the HIA recommendations? How is this different from contract or CRM research?

## **12. Key factual errors in the report**

12.1. On page 12 of the revised HIA the word “later” has been inserted, but it is still implied that the rock art study was incorporated into the initial EMP, which it was not. As is clearly indicated on the cover of Mr Hollmann’s report it was completed in July 2010, and was in fact only conducted as an outcome of appeal and interdict processes set in motion by the Mapungubwe Coalition.

12.2. The legal issue around terminology we raised in response to the first heritage report pertains. The Roodt study was not a Heritage Impact Assessment, and definitely not a “broad-based HIA” (HIA page 12). Rather it was essentially an AIA, as it only contained information about the archaeology.

12.3. Map 5 illustrates the distribution of rock art sites, not Stone Age sites as indicated. An earlier version of this map was produced by SANParks with information from Mr Eastwood as part of the nomination process. Not all of the rock art sites are linked to the Stone Age; some contain farmer art.

12.3.1. It also is worth noting the proximity of the rock art site in Zimbabwe to the Vele colliery.

12.4. Map 6 only illustrates farming community sites that date from AD 900 to AD 1300 in the region, not the “distribution of various groups that settled in the region of the Mapungubwe cultural landscape during various periods in history”.

12.4.1. It has been shown conclusively that hunter-gatherers making stone tools shared the landscape with farmers at this time. Furthermore, occupation of the area did not end in AD1300, but continued throughout the sequence.

12.5. Map 11 in fact only reflects Zimbabwe culture type sites in the MCL. Again we point out that hunter-gather occupations continued into this period, and that their presence is significant i.t.o the OUVs.

12.5.1. We also are intrigued that Figure 11 implies that the Venda state dates to the period before AD 1450. Most recognised research places the development of this state much later.

12.5.2. Furthermore, we are surprised that the presence of Sotho-Tswana speakers who occupied the area before the consolidation of the Venda state in the region is ignored. One of the earliest Sotho- Tswana sites in southern Africa - the site Icon – is located between Alldays and Pontdrif has been radiocarbon dated to A.D. 1330 +/- 50 (Pta-1652). Several other ancestral Sotho-Tswana sites dot the MCL landscape.

12.6. Table of sites in the AIA page 42 Site 1 is not Happy Rest but K2; had it been EIA, its significance should be much higher. This has been corrected in the HIA.

### **13. Comments on key recommendations**

#### **13.1. Buffer**

13.1.1. We reiterate that the industrialisation of the declared MCL WHS buffer zone is unacceptable.

13.1.2. We also reiterate that ASAPA is opposed to the shrinkage of the buffer. Instead we propose that it should be expanded to address any gaps.

13.1.3. Whilst the official status of the buffer zone on the eastern side is obviously problematic and should be addressed, we call on CoAL of Africa to honour the de facto buffer zone created by the



Protected Areas Act. As acknowledged in the revised HIA this Act provides for an automatic 10 km buffer zone.

13.1.4. We strongly suggest that the processes initiated by the TFCA should be supported as these plans include developments in Zimbabwe and Botswana that would protect other sites (similar to those on Vele) that formed part of the MCL.

### 13.2. Repositories and role of SANParks

13.2.1. We support the spirit of the suggestions regarding lodging information and reports with SANParks, and note that it is important for reports on all research in the area as well as publications to be lodged with SANParks.

13.2.2. ASAPA, however, notes that – the facility at Mapungubwe is largely advertised as an “interpretation centre”, and does not have storage and archival facilities and staff; as such it is not a legally designated repository for archaeological material or archival material.

13.2.3. We also note that in terms of the NHRA S16 (2) ix b SAHRA “ must establish and maintain, for its own use and for the use of all heritage authorities and bodies and the public, the national heritage resources library, including documentary and other records relating to the national estate”. This means that SAHRA is the centre with which documents relating to all archaeological research must be lodged, particularly in view of the fact that the MCL and WHS is also a National Heritage Site under the umbrella of SAHRA. Consequently, archaeologists have lodged reports on all permitted archaeological research in the MCL with SAHRA.

13.2.4. Furthermore, field notes, photographs, data bases, etc. are owned by the institutions (such as universities) that employ archaeologists. While reports of work in the Mapungubwe area should be lodged with SANParks, as well as SAHRA and the funding agencies, ownership of data is far more complicated than presented on page 34 of the revised HIA.

13.2.5. Similarly, ownership (and custodianship) of excavated material is complicated.

13.2.6. Moreover, the MNP currently does not have the capacity to store, curate and make available for study the enormous amount of material kept elsewhere.

13.2.7 Decisions about the repatriation of material culture to the area should be based on a transparent process in which ALL stakeholders participate, and should be guided by SAHRA who is tasked with this duty in terms of the NHRA. This process would establish if placing the excavated collections in the MNP will enhance the sense of place for the Mapungubwe landscape.

## 14. Monitoring & management

14.1. The report suggests on page 57 that a consultancy should monitor the effectiveness of the conservation efforts. The privatisation of monitoring (one of SAHRA's roles) is very inappropriate.

Instead, SAHRA should carry out quarterly inspections, as per their mandate. SAHRA obviously is entitled to co-opt specialists to assist where necessary.

14.1.1. Based on the principle that developer should pay all the costs associated with the SAHRA monitoring, inspections should be at CoAL Africa's expense.

14.1.2. Furthermore, it is essential that SAHRA has free access to ALL areas they wish to visit on the colliery and Vele property.

14.2. ASAPA welcomes the suggestion that a full time archaeologist should be appointed by CoAL. Noting the importance of this landscape, ASAPA suggests that the 'resident archaeologist' must at minimum meet ASAPA Field Director status, but ideally should be accredited as a Principle Investigator.

14.2.1. The work of the resident archaeologists should be overseen by SAHRA, or an independent panel constituted by SAHRA.

14.3. We are perplexed by the suggestion that SANParks should monitor the dust levels. This is an expert activity requiring professional equipment. Surely a professional should be appointed to monitor dust.

14.3.1. Dust monitoring should take place at the rock art sites within 15km from the Vele colliery. This should include the sites in Zimbabwe which are the closest.

14.4. Several suggestions such as planting trees and disposing of earth in areas without sensitive heritage are made. It is crucial that all recommendations that have heritage and environmental consequences should be considered by both heritage and environmental specialists before implementation.

14.4.1. Furthermore, SANParks encountered difficulties when they experimented with planting of indigenous trees to rehabilitate farmland. These should be considered.

14.4.2. Any areas where holes will be dug to plant trees should first be surveyed for archaeological sites and remains by the resident archaeologist. If archaeological sites will be disturbed permits must be obtained from SAHRA before any digging starts. If necessary mitigation must also take place.

## 15. Mitigation

15.1. While the authors have given consideration to tangible risks and suggest mitigatory factors, we are still left with the feeling that they are somewhat trusting and uncritical. They assume that government and the mine will act in the best interests of (a) the communities and (b) the heritage resource.

15.2. The history of this particular mining development, however, gives us every reason to believe that this will not be the case.

15.3. It is crucial that a water-tight management plan be put in place, because experience has shown us that once mining begins, it stops for very little.

15.4. It is all very well to have an archaeologist on the team to spring into action when a site is discovered, but the colliery Heritage Management Plan should define:

15.4.1. the time frames that he/she will have to work under;

15.4.2. how much of a site will be removed before mining can continue;

15.4.3. procedures that will be followed when previously unknown graves are discovered. These should include a period for community consultation, etc.

15.5. A destruction permit should be sought each time from SAHRA. Sites for which destruction permits are sought must be inspected by SAHRA or their duly authorised representatives.

15.5.1. If the duties are delegated to the Limpopo Heritage Resources Agency (LiHRA) a special permit committee must be put together to provide guidance (given the province's officials' reported tendency to be bought off).

15.6. It is claimed that threats to other resources such as rock art and stone age sites are adequately covered using the NHRA. We suggest that it should be noted that such protection depends on the adequacy of the impact assessment.

15.6.1. While there is no rock art that has been identified on the Vele property, it should still be necessary for a monitoring programme to be set up for rock art sites in the surrounding areas.

15.6.2. Similarly, the possibility of underground Stone Age sites has not yet been adequately dealt with.

## **16. Heritage conservation and the MCL WHS core and buffer**

16.1. ASAPA is deeply concerned that the declared MCL WHS buffer zone is not honoured by the Department of Mineral Resources, and that the department has granted more than 20 prospecting rights on farms located in the buffer area. Machete, one of the farms on which prospecting rights has been granted extends into the MCL WHS core area.

16.2. These prospecting permits are of additional concern, because in South African law mining rights reverted to the state. This means that prospecting rights can be granted without permission of landowners in the MCL, many of whom are deeply concerned about the heritage sites on their properties. Land claimants are in a similar position.

16.3. We also are concerned that the state party and managing authority have not worked more closely with I&APs in the buffer zone to protect, and develop heritage resources.

16.4. We also are deeply concerned that SANParks as managing authority has paid less attention than we feel is appropriate to the management of archaeological sites on the MCL WHS as a whole.

16.5. We also feel that the existing management plans are not always followed. For example, the rehabilitation of the hill and development of tourism infrastructure was guided by specific routes, but

paths on Mapungubwe hill have not been maintained regularly and at times visitors are allowed to leave the paths. In the long term this will cause substantial erosion to the vulnerable deposit on the hill.

16.6. Similarly, the site of K2 was fully rehabilitated during the preparation for tourism, but lack of maintenance now appears to have again resulted in the need for mitigation as suggested in the HIA.

16.7. One of the factors that contributed to this state of affairs is that the much delayed appointment of an archaeologist with heritage experience, one of the conditions of declaration. This only took place in the recent past. In spite of this appointment, we have been informed that only limited resources have been placed at his disposal.

16.8. Another factor contributing to the state of affairs is the limited access to resources within the MNP. We have been informed in the past that SANParks head office has not provided staff with reports, journals and books regarding archaeological resources in the MNP and broader MCL. This has placed them in a very difficult position.

16.9. ASAPA fails to understand why the rock art trails, for which extensive management plan work has been conducted, have not been actualised.

## **17. Suggestions regarding Heritage Management in the MCL beyond Vele colliery**

### **17.1. Department of Environmental Affairs**

17.1.1. The state party must engage with the Department of Mineral Resources (DMR) to ensure they refrain from issuing prospecting permits and mining permissions in the MCL core area and buffer zone.

17.1.2. Rather than 'amend' the buffer zone the state party should embark on a process of education to enlighten those who are not familiar with the purpose of the MCL WHS buffer zone. In particular this applies to the Department of Mineral Resources who have issued prospecting licenses in this protected area.

17.1.3. Rather than shrinking the buffer zone to 'make it more manageable' the state party should engage landowners and establish public-private partnerships to manage the buffer zone. Many of the larger landowners, such as the Venetia reserve, are already actively involved in protecting, researching and managing heritage in the MCL buffer zone.

### **17.2. CoAL of Africa**

17.2. One of the duties of the resident archaeologist should be heritage education. As part of this mineworkers and managers, local communities, farmers and game ranchers should be educated as to the tourism value of heritage sites, and that sites on their properties could be used to enhance the overall tourism experience.

### **17.3. SAHRA**



17.3.1. Obviously SAHRA has a crucial role to play in managing the MCL. This includes permitting, monitoring and guiding all the other private and public parties involved.

17.3.2. In order to ensure that the protection of the area is materialised, and developers cannot claim ignorance when proposing the industrialisation of the MCL we suggest that SAHRA follows the procedures set out in Section 11 of the NHRA. If they have not yet done so. According to this they should notify the Registrar of Deeds who must for all properties in the declared MCL core area and buffer zone: “(a) endorse the title deed of the place in question filed in the deeds office; (b) make an entry in the appropriate registers and upon the owner’s title deed as soon as it is lodged in the deeds office, relating to the particulars furnished in terms of subsection (10); (c) identify the area of the protected place; and clearly state the particulars of the protection order or heritage agreement”.

17.3.3. Furthermore in terms of Section 9 (12) the Surveyor-General should be instructed to “(a) endorse upon the relevant records filed in his or her office an entry referring to the notice furnished in terms of subsection (10); and (b) state the particulars of the protection order or heritage agreement in broad terms” for all the properties in the MCL core area and buffer zone.

#### 17.4. SANParks

17.4.1. It is crucial that SANParks make resources available to the MNP archaeologist and other staff tasked with heritage duties in the MNP so that they can effectively perform their duties.

17.4.2. SANParks must implement the integrated management plan for the MCL MNP, as well as the site management plans.

17.4.3. They also must adhere to the site specific management plans. For example visitors are allowed to wander off the paths on Mapungubwe hill. This is in direct breach of the management plan for the site.

## 6.2. STATE PARTY’S ADDRESS TO THE UNESCO/ ICOMOS REACTIVE MONITORING MISSION

### Preamble

The State Party would like to thank the joint UNESCO World Heritage Centre / ICOMOS Reactive Monitoring Mission for fruitful and robust engagement during their visit from 18 -20 January 2012. The Mission has succeeded in providing a more coherent understanding of the key issues surrounding the conservation of the World Heritage Site (WHS).

The State Party acknowledges that some of the issues raised support the country’s on-going efforts to conserve the area in terms of the national and global conservation imperatives. Other concerns relate to broader issues of socio-economic development which are currently addressed through State Party processes including political and regional integration processes. For example, some of the issues raised were of no direct relevance to the Terms of Reference of the UNESCO/ ICOMOS Mission e.g. community complaints on shareholding, land claims, and other community dynamics.

## **Findings and Recommendations of the Heritage Impact Assessment**

The State Party is pleased to inform the mission that following on the decision of the 35th World Heritage Committee meeting, a comprehensive heritage impact assessment was conducted. The Terms of Reference (TOR) for the HIA were approved by the World Heritage Centre and ICOMOS. Over and above the approved TOR, the State Party added critical elements in order to ensure a more comprehensive and robust study that looks at the wider Cultural Landscape.

The State Party embraces the findings and recommendations of the Heritage Impact Assessment and had already started working on some of the issues that happen to be recommended by the draft HIA. The report will be further strengthened to take into account some of the issues raised during the Mission.

### **Clarification of the buffer zone.**

The State Party wishes to acknowledge the current lack of clarity regarding the buffer zone around the Mapungubwe Cultural Landscape WHS. In order to clarify the buffer zone issue, it is important that processes which have unfolded so far regarding the property's buffer zone be reviewed.

The Mapungubwe Cultural Landscape was listed in 2003 as a world heritage site. At the time of the nomination it was known as the Vhembe-Dongola National Park. Properties proclaimed as national park enjoy the highest protection status in conservation legislation in South Africa, and are managed in terms of the National Environmental Management Protected Areas Act, (Act. No. 57 of 2003). The State Party stated in the nomination dossier that the site is made up of a core area of 28 168.66 ha (the Vhembe-Dongola National Park). The State Party also mentioned in the nomination dossier that the buffer zone is made up of three properties (Venetia-Limpopo Nature Reserve, Vhembe Nature Reserve and the Limpopo Valley Game Reserve) which when added to the core, totals 100 000 hectares. The ICOMOS 2003 evaluation report however implies that the buffer zone is 100 000 ha. Both the State Party nomination and the ICOMOS reports however did not provide a map/s of the buffer zone.

Although the ICOMOS evaluation report notes that the Trans-Frontier Conservation Area (TFCA) when established, will provide an effective buffer zone, the report does not in its recommendations cite the lack of a clear buffer zone as one of the issues to be addressed while the site is deferred, as they had recommended.

At national (State Party) level South African legislation: the World Heritage Convention Act (Act. No. 49 of 1999), requires that a property that is inscribed on the World Heritage List should be nationally proclaimed as a World Heritage Site. In compliance with the World Heritage Convention Act, the State Party in 2009 proclaimed the aforementioned properties of the buffer zone together with the core area as a World Heritage Site.

At the time of the proclamation of the WHS and buffer zone the State Party included in the buffer zone entire properties whose owners desired to be included in the WHS buffer. This resulted in a buffer that did not serve any of the UNESCO purposes for a buffer zone.

The Trans-Frontier Conservation Area map as submitted to UNESCO at the time of nomination also corresponds on the South African side with the buffer zone proclaimed by the State Party in 2009.

The 7 kilometer stretch between the property and the mining area was left out of the 2009 buffer zone due to the fact that an agreement could not be reached with the owners. This 7 kilometer stretch is now in the process of being incorporated into the conservation area (Mapungubwe National Park) and buffer zone and negotiations with the land owners are at an advanced stage.

Through previous and current cultural heritage studies, including the draft Heritage Impact Assessment, the State Party has mapped up the areas that are sensitive and critical to the protection of the Outstanding Universal Value and this process has enabled the State Party to draft what it considers an effective buffer zone for the property. The State Party is now in the process of internal consultation to finalize the proposed buffer zone before such can be submitted to UNESCO.

The State Party wishes to remind the mission that in following the guidelines of UNESCO with regard to buffer zones, the size of the buffer zone will therefore be determined by the purpose. The State Party therefore will seek through this process, to come up with a buffer zone that serves as an enclosure for the attributes that relates to the Outstanding Universal Value but falls outside of the core area.

It is the opinion of the State Party and this is supported by the Heritage Impact Study that the OUV has so far not been negatively affected by the 7 Kilometer stretch not being part of the buffer zone.

#### **Memorandum of Agreement between the state party and the mining company.**

The state party wishes to bring to the attention of the Mission the fact that beyond the State Party obligations, a Memorandum of Agreement (MoA) has been entered into between the mining company and the State Party. The MoA binds the mining company to comply with the conditions of the MoA which includes full compliance with all relevant legislation and development of biodiversity offsets programme which includes a full range of offset elements in respect of natural heritage, cultural heritage, water resource conservation and tourism in order to optimize benefits to local communities.

The mining company has already established an Environmental Management Committee in order to ensure coordination of the implementation of the MoA.

### **6.3 Retrospective Statement of OUV**

Mapungubwe Cultural Landscape, South Africa

Id. N° 1099

Date of inscription 2003

#### **Brief synthesis**

The Mapungubwe Cultural Landscape demonstrates the rise and fall of the first indigenous kingdom in Southern Africa between 900 and 1,300 AD. The core area covers nearly 30,000 ha and is supported by a suggested buffer zone of around 100,000 ha. Within the collectively known Zhizo sites are the remains of three capitals - Schroda; Leopard's Kopje; and the final one located around Mapungubwe hill - and

their satellite settlements and lands around the confluence of the Limpopo and the Shashe rivers whose fertility supported a large population within the kingdom.

Mapungubwe's position at the crossing of the north/south and east/west routes in southern Africa also enabled it to control trade, through the East African ports to India and China, and throughout southern Africa. From its hinterland it harvested gold and ivory - commodities in scarce supply elsewhere – and this brought it great wealth as displayed through imports such as Chinese porcelain and Persian glass beads.

This international trade also created a society that was closely linked to ideological adjustments, and changes in architecture and settlement planning. Until its demise at the end of the 13th century AD, Mapungubwe was the most important inland settlement in the African subcontinent and the cultural landscape contains a wealth of information in archaeological sites that records its development. The evidence reveals how trade increased and developed in a pattern influenced by an elite class with a sacred leadership where the king was secluded from the commoners located in the surrounding settlements.

Mapungubwe's demise was brought about by climatic change. During its final two millennia, periods of warmer and wetter conditions suitable for agriculture in the Limpopo/Shashe valley were interspersed with cooler and drier pulses. When rainfall decreased after 1300 AD, the land could no longer sustain a high population using traditional farming methods, and the inhabitants were obliged to disperse. Mapungubwe's position as a power base shifted north to Great Zimbabwe and, later, Khami. The remains of this famous kingdom, when viewed against the present day fauna and flora, and the geomorphological formations of the Limpopo/Shashe confluence, create an impressive cultural landscape of universal significance.

**Criterion (ii):** The Mapungubwe Cultural Landscape contains evidence for an important interchange of human values that led to far-reaching cultural and social changes in Southern Africa between AD 900 and 1300.

**Criterion (iii):** The remains in the Mapungubwe Cultural Landscape are a remarkably complete testimony to the growth and subsequent decline of the Mapungubwe State which at its height was the largest kingdom in the African subcontinent.

**Criterion (iv):** The establishment of Mapungubwe as a powerful state trading through the East African ports with Arabia and India was a significant stage in the history of the African sub-continent.

**Criterion (v):** The remains in the Mapungubwe cultural landscape graphically illustrate the impact of climate change and record the growth and then decline of the Kingdom of Mapungubwe as a clear record of a culture that became vulnerable to irreversible change.

**Integrity** All remains of the main settlements are in the nominated property, as are all major phases of the Mapungubwe kingdoms' development and decline. The property contains substantial areas of virtually untouched cultural landscape of very high quality but, pending their decommissioning, these are



separated by some areas of modern citrus plantations and circular irrigated agricultural fields in private ownership. The considerable agricultural enterprise of the final phase at Mapungubwe has vanished. Although much of the core landscape has returned to its unimproved state with wild grazing game animals, the recent opening up of the property to big game, especially elephants needs to be considered, and is being monitored.

The Messina area is a rich mining area and the diamond mining operations at Riedel (small scale) and Venetia (major operation) could have a potential impact on the property. There is also a possibility that deposits of other valuable minerals may yet be found. With mining rights being recently returned to the State, better future control was anticipated but the granting of a mining licence for coal 5 km from the boundary of the property, in a highly sensitive area adjacent to the Limpopo river and in the proposed buffer zone that was submitted at the time of the inscription, is a considerable threat. The integrity of the site has been affected by the standard of the excavations in the 1930s which it could be argued led to valuable evidence being lost – and thus the completeness of the site, in both physical and intellectual terms has been compromised.

***Authenticity*** The nominated property and buffer zone have largely not been subjected to any destructive form of human intervention since the remains were abandoned, and the current agricultural activities have not had a major impact on the cultural landscape in terms of its ability to convey its value. However there is a need to ensure that old excavations are not eroded by climatic forces or by uncontrolled visitors.

***Protection and management requirements*** The Mapungubwe site and the buffer zone are legally protected through the National Heritage Resources Act (No 25 of 1999), the World Heritage Convention Act (No 43 of 1999) and the National Environmental Management Act (No 73 of 1989). The property is also recognized as a protected area in terms of the National Environmental Management Protected Areas, 2003 (Act 57 of 2003). This legislation implies that mining or prospecting will be completely prohibited from taking place within the property and the buffer zone. Furthermore, any development with a potential impact on the property will be subjected to an environmental impact assessment.

SANParks is the management authority for the property and provides overall management involving coordinating government and local community efforts to conserve the site. SANParks is currently updating the Integrated Management Plan. Regular consultative meetings with stakeholders and local communities take place on the site through the park forum and by other means of engagement. A Trilateral Memorandum of Understanding is also being drawn up with the objective of establishing the Limpopo-Shashe Transfrontier Conservation Area (TFCA). This very extensive area of 5,040 km<sup>2</sup> will, when established, constitute an effective buffer zone. It is intended that each participating country will concentrate on one facet of protection: cultural heritage in South Africa; wildlife in Botswana; and living cultures in Zimbabwe.

To help guarantee long-term protection for the property there is a need to complete the Integrated Management Plan and to submit the buffer zone for approval by the World Heritage Committee. There is also a need to ensure that any consideration of mining licenses is in line with the recommendations of

the Technical Workshop on World Heritage and Mining adopted at the 24th session of the World Heritage Committee, to ensure that mining does not constitute a threat to the property, its buffer zone or its wider setting.

## 6.4 Report from Vhangona cultural movement on the interaction between their community and Coal of Africa



A MOVEMENT OF THE ABORIGINAL CITIZENS OF THE UNITED KINGDOM OF VENDA OF YORE (068-963-HP0)  
ENO; T>EPRESIOEHT10071i6029271/0763908547/ltomoCPwobmail.LuoTt<ESEC.GEHOB2t<&912S

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Since our last meeting with UNSECO right here on the 18<sup>th</sup> November 2010, there has been very little that was done on the important issue of community consultation.

From our observation as Vhangona, it seems as if Coal of Africa is either not willing or they are only determined to go ahead with the project without our inputs. It seems they have a political or other form of backing or connection where they are constantly assured of the continuity of the project despite the concerns, objections, and expert advice given even by the consultants they themselves appointed to investigate the impact of the very same project upon the Mapungubwe Cultural Landscape (See copy of same as attached- Annexure VNCM 01). Right now as we are sitting here, the project has been going on for some time. These people never stopped their operations.


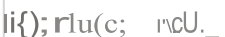


Now on the issue of consultation since November 2010, they tried to consult us. The first consultative meeting they had with us as community leaders was held here on the 2<sup>nd</sup> June 2011. This meeting failed to achieve its intended purpose. The reason for its failure was because CoAL wanted to push its agenda through without according the people the chance to present their cases the way they came prepared. All they needed was a meeting scheduled for about one and half hours, and then give them the go ahead they needed. We as community leaders objected to this and this led to the failure of the meeting. Community leaders present at the meeting put it to CoAL that they were talking about Mapungubwe as their heritage, and so they would not be rushed through the meeting just to please the greedy capitalists. It was then resolved that another meeting will be convened. This took place on the 4<sup>th</sup> July 2011 at the Mountain Inn Hotel just outside Louis Trichardt. The meeting was being recorded with a video camera.

CoAL made their lengthy presentations. Then came time for community leaders. When we the Vhangooa presented our document (See copy of same as attached –Annexum VNCM 02), they complained that it was too long and they cut us short and ordered us to sit down. Under protest we did.

All the community leaders that made presentations unanimously rejected the proposed mining project. At the end of the meeting CoAL promised to give us feedback on the submissions. To date we are still waiting for this. But as we have already indicated, the mining project is going ahead.

Now our position as Vhangooa has not changed. Taking into account the proximity of the project to the Mapungubwe Hill, and also considering the clandestine way in which CoAL, together with some influential government officials handled the consultation process. All this, coupled with the arrogant way and prejudice they have upon the community leaders, and of course upon the communities they represent. It goes without saying that our communities mean nothing to them. As long as they got a nod from politicians, everything else is nothing to them. We stand opposed to the Vele colliery project at the doorstep of Mapungubwe. This is our official position and we are not prepared to compromise on this. The project could be taken elsewhere, and we have no problem with that.

Thus signed:

NAME	DESIGNATION	SIGNATURE	DATE
Mr T R Rakhadani	President		18.01.2012
Mr N M Tshilande	Deputy President		18.01.2012
Ms FC Kwin a	Secretary General		18.01.2012
Mr N Cetshisaui	Dep. Sec. General		18.01.2012



UNYEN 017

The Mapungubwe Cultural Landscape (MCL) World Heritage site is located near the confluence of the Limpopo and Unpopo Rivers. The municipality for Botswana, South Africa and Zimbabwe (see Figs 1 & 2). The boundaries of the property are defined by the coordinates:

NW corner 22°12'58"S 29°01'22"E

NE corner 22°10'10"S 29°2'04"E

SE corner 22°14'15"S 29°31'35"E

SW corner 22°14'40"S 29°2'00"E

This area is bound by the Limpopo River to the north, in the west by the Allday-Pont Clift road; to the south by the Mossina-Pont Clift road and the boundary of the farm Riedel; to the east the boundary of the farm Riedel and an as yet unsurveyed line up the western side of the irrigated lands on the farm Welpe. In total, this area is 29 168.66 hectares in geographical extent. This is likely to include up to 100 000 hectares of land for developing a Transfrontier park including adjacent areas of Botswana and Zimbabwe are included.

According to the nomination dossier, the Mapungubwe Cultural Landscape consists of

Remains of pre-colonial (Mapungubwe period),

Archaeological remains testifying to Mapungubwe's growth 900-1200 AD (Zimbo, Leopard's & Kopje):

- Remains of early settlement Stone Age & Iron Age & rock art; 'Natural' landscape surrounding the built remains;
- Intangible heritage Mapungubwe associated with sacredness, beliefs, customs and traditions of the community.
- Living heritage: traditions and associations such as rain making, and participation by local community in reburial ceremonies
- landscape sharing and interaction between the site and the surrounding area

10/11/2011

Although the landscape has evidence of human occupation dating back to millions of years, the nomination dossier states that the landscape was nominated on the basis of the Iron Age period, particularly the period between AD900 and 1300. The Mapungubwe Cultural Landscape, whose remains are a testimony to the earliest known state society in Southern Africa (AD 900-1300), when viewed against the present day fauna and flora, and the geomorphological formations of the Umpopo/Shashe confluence, creates an impressive landscape of universal significance (Mapungubwe Nomination Dossier 2000). The occupation of the Mapungubwe Cultural Landscape (MCL) has continued over time antedating with the forced removal of local people during colonialism and the establishment of private farms, ranches and mines (KYS 2011; see Annexure XX).

The MCL contains about 400 archaeological sites in the core area (listed property), some of which provides evidence for the evolution of the state of Mapungubwe. The Settlement sequence of the MCL starts with the Early Stone Age, followed by the Middle and Late Stone Ages with the Early, Middle and Iron Ages subsequently following (Huffman 2000; Manyanga 2007). Recent research demonstrates the contemporary occupation of the landscape by both hunter gatherers and farmers during the Iron Age to historical times (Hall and Smith 2000). In the last hundred years, farmers of European stock displaced local people creating ranches. Mines have been established in the area showing the continual evolution of this layered landscape (KYS 2011).

Three main phases of development are recognized in the Mapungubwe Cultural Landscape and these are associated with the Iron Age (Huffman 2007). The first phase, known as Zhizo, lasted from about AD 900-1020 and is best preserved at the site of Schroda. The second phase, known as Leopard's Kopje or K2, has been investigated in most detail at the site known as K2 on the farm Greefswald and dated from about AD 1020-1220. The most elaborate settlement during the third phase was on Mapungubwe Hill and the adjacent Southern Terrace and dated from AD 1220-1300. At the height of its importance between AD 1220 and 1300, the Mapungubwe Cultural Landscape sustained a population of at least

9000 people. According to Huffman (2000), regular flooding of the Limpopo River provided silt and water for crops. Grazing lands enabled stock to be kept. Elephants were hunted for their ivory and other animals for their hides while mining provided iron, gold and copper ores (Mapungubwe Nomination Dossier 2002). This landscape has evolved overtime with each period leaving its marks, a process that continues to this day (Manyanga 2007).

At any given point in history, MCL witnessed new activities done at different scales. In the last thirty years or so, archaeological excavations, cattle and game ranching, intensive agriculture and mining have threatened the integrity of the landscape (see also Mapungubwe Nomination Dossier). The establishment of the Park has cushioned the 400 sites within its borders from the ravages of development. Those outside are protected through the National Heritage Resources Act and ancillary legislation.

#### 1.5 Heritage at risk and mining

There are a number of World Heritage Sites at the risk of mining or modern development encroachment in the form of scale and extent similar to Mapungubwe. A significant number of sites is found in Africa, and indications are that this number is on the increase. According to IUCN, African natural World Heritage sites that are increasingly threatened by commercial mining and oil/gas projects include Virunga National Park in the Democratic Republic of Congo (gold mining and other armed conflict posing a threat to a park with greatest diversity of habitats of any park in Africa: from steppes, savannas and lava plains, swamps, lowland and montane forests to volcanoes and the unique giant herbs and snowfields of Ruwenzori over 5,000m high), Comoe National Park, Cote d'Ivoire (the government is now issuing licences to explore in West Africa's largest biosphere reserve), Mount Nimba Strict Nature Reserve on the boundary of Cote d'Ivoire and Guinea (its unique biodiversity is under threat from miners extracting high grade iron ore), Dja Biosphere Reserve, Cameroon (home to some of the largest and best protected rainforest tracts in Africa, is under threat from cobalt mining on the precincts of the reserve), Kahuzi-Biega National Park in the DRC (threat to gorillas due to illegal logging and gold mining), Selous Game Reserve, Tanzania (uranium

exploration within the property, a 50,000 km<sup>2</sup> sanctuary to a large numbers of elephants, black rhinoceroses, cheetahs, giraffes, hippopotamuses and crocodiles, (relatively undisturbed by human impact), Air and Tenere Nature Reserve, Niger (the largest protected area in Africa, covering some 7.7 million ha, due to its unique desert landscape and fauna is under threat from petroleum prospecting activities). Manovo-Gounda Nature Reserves, Central African Republic, (the largest savanna park in west and central Africa, located at a major biogeographic crossroads of central Africa, being threatened by gas and petroleum exploration), Mana Pools National Park, Sapi and Chewore Safari Areas. Zimbabwe (illegal gold, copper and uranium).

These natural or cultural landscapes may be regarded as heritage at risk. These mining and exploration projects are in their nascent stages, which means that governments, mining and oil/gas companies, financial backers and other stakeholders have the opportunity to make well-informed decisions for present and future generations by committing to preserving the heritage and thereby also safeguarding the livelihoods of local people and Africa's long-term sustainable development.

Other world examples include Larentz National Park, Indonesia, with the highest level of biodiversity in South-East Asia (gold mining taking place directly in the national park), The Cave of Hands (Cueva de las Manos), Argentina (where gold mining is now taking place within the associated landscape, threatening outstanding panels of rock art in the Pinturas River ravine), Yellowstone National Park, USA (waste contamination, sewage leakage, alien species and gold mining, all posing a threat to the park's ecology and wildlife), Kakadu National Park, Australia (uranium mining is taking place inside the park, posing a risk to indigenous people living there), Donana National Park, Spain (metallic waste spill), Zhoukoudian, China (quarrying within the site precincts, leading to loss of important geological specimens).

A wide range of conservation measures have been suggested or implemented to minimise threats to OUVs for which the world heritage sites adjacent to the mining represent. The

conservation, protection and management of Mapungubwe should draw from some of these examples. In respect of granting of mining licences, environmental management, community development, stakeholder participation, etc. the main lesson from this comparative study is that if done within a compliance framework heritage and development can co-exist.

## 1.6 Summary

In conclusion, each generation has successively left its mark on the MCL since time immemorial. In recent times, population pressures and the need for economic development have threatened the existence of remains from bygone generations, some of which have outstanding universal value to humanity. Such threats and impact must be identified, managed and mitigated to ensure availability for present and future generations. It must always be borne in mind that the OUVs of Mapungubwe are based on the period AD 900 to 1300 (Mapungubwe Nomination Dossier 2000). As such, threats to the integrity of sites dating to this period constitute threats to the OUVs. The threats to other resources such as rock art and Stone Age sites are adequately covered using the South African National Heritage Resources Act.

## 2\_ CONCEPTUAL APPROACHES

Given the sensitivities surrounding the Mapungubwe Cultural Landscape a number of conceptual approaches were utilized to distill results that are specific to all the important issues. These approaches were designed to assess the impacts and opportunities associated with different land use activities around the Mapungubwe Cultural Landscape but with special reference to the South African side. They stem from the local and international best practice represented by ICOMOS and its regulations, UNESCO and its regulations and guidelines, as well as the local legislation and compliance framework.

### 2.1. Understanding Outstanding Universal Value (OUVs)



The World Heritage Convention Concerning the Protection of the World Cultural and Natural Heritage (1972) provides a framework for listing natural and cultural heritage of universal value as World Heritage Sites. It also notes that globally, heritage is at risk and that "deterioration or disappearance of any item of the cultural or natural heritage constitutes a harmful impoverishment of the heritage of all nations of the world". Heritage protection at the national level very often remains incomplete because of the scale of the resources which it requires and of the insufficient economic, scientific and technological resources of the country where the property is situated. It is for this reason that the Convention regards parts of this heritage to be of outstanding interest and therefore need to be preserved as part of the world heritage of mankind as a whole.

The concept of outstanding universal value (OUV), first discussed by UNESCO in 1976, was interpreted as "meaning that a property submitted for inclusion in the WHL should represent or symbolize a set of ideas or values which are universally recognized as important, or having influenced the evolution of mankind as a whole or at one time or another". Since then, a number of criteria have been set to measure OUV (see Jokilehto 2005), and at its 23rd session, the World Heritage Committee agreed with the following definition, as set out in paragraph 49 of the Operational Guidelines (2005):

...outstanding universal value means cultural and/or natural significance which is so exceptional as to transcend national boundaries and to be of common importance for present and future generations of all humanity. As such, the permanent protection of this heritage is of the highest importance to the international community as a whole..."

The Committee recognized that the definition and application of OUV would be subject to evolution over time. This evolution is reflected in the changes that have been made to the criteria and in their application. The Committee also noted that the concept of OUV is often poorly understood and requires improved communication generally at the site level and recommended that the identification of OUV be achieved with the participation by stakeholders including local communities and indigenous people. The development of the

statements of OUV (SoOUV) for World Heritage properties as required by the Operational Guidelines for the Implementation of the World Heritage Convention (UNESCO 2008) was meant to set out clearly the attributes that reflect OUV and the links between them. Integrity and authenticity are also useful.

There are also concepts such as 'limits of acceptable change' and 'absorption capacity' which are being discussed within the framework of OUV. It is not clear at this stage how useful these concepts are, or how they may be operationalized. There is also no agreement on how to revive heritage value that has been eroded (ICOMOS 2008).

The Mapungubwe Cultural Landscape, whose remains are a testimony to the earliest known state society in Southern Africa (AD 900-1300), when viewed against the present day fauna and flora, and the geo-morphological formations of the Limpopo/Shashe confluence, creates an impressive landscape of universal significance. Mapungubwe was placed on the World Heritage List in 2003 on the basis of the following criteria:

Criterion (ii): The Mapungubwe Cultural Landscape contains evidence for an important interchange of human values that led to far-reaching cultural and social changes in Southern Africa between AD 900 and 1300.

Criterion (iii): The remains in the Mapungubwe Cultural Landscape are a remarkably complete testimony to the growth and subsequent decline of the Mapungubwe State which at its height was the largest kingdom in the African subcontinent.

Criterion (iv): The establishment of Mapungubwe as a powerful state trading through the East African ports with Arabia and India was a significant stage in the history of the African sub-continent.

their own autonomous republics within the Russian state, and the Canadian Inuit form a majority of the territory of Nunavut (created in 1999).

It is also sometimes argued that it is important for the human species as a whole to preserve a wide range of cultural diversity as possible, and that the protection of indigenous culture is vital to this enterprise.

An example of this occurred in 2002 when the Government of Botswana expelled all the Kalahari Bushmen known as the San from their lands on which they had lived for at least twenty thousand years. President Festus Mogae has described the Bushmen as "stone age creatures" and a minister for local government, Margaret Nasha, likened public criticism of their eviction to criticism of the culling of elephants. In 2006, the Botswana High Court ruled that the Bushmen had a right to return to their land in the Central Kalahari Game Reserve.

#### Indigenous Viewpoints

Indigenous peoples are increasingly faced with threats to their sovereignty, environment and access to natural resources. Examples of this can be the deforestation of tropical rainforests where many native tribes' subsistence lifestyles are threatened. Assimilative colonial policies resulted in issues related to aboriginal child protection. [Wikipedia] [For further information on the rights of indigenous peoples, see the attached annexes from the African Commission on Human and Peoples' Rights on the Declaration United Nations Declaration on the Rights of Indigenous Peoples, as attached: VNCM 20, i.e. paragraphs 14 to 45]

In this way we also believe that we have managed to clarify the fact that the VhangoDa-Vhavana are as good an autochthonous people of Lukungubwe in general, and the Mapungubwe Cultural Landscape in particular, as the Australian aborigines and other aboriginal peoples of the world are. And so we trust that no one will ever ask where they came from or when they came here. We equally believe that no one will ever question our involvement in any issue affecting Mapungubwe, both now and in future. We believe that these stereotypes and bigotries are now history. Southern Africa does not belong to former

development tends to eliminate unique features of the landscape. Sense of place may appear a fuzzy or purely subjective a concept, but there are clear definitions that begin to narrow its focus. Some definitions perceive sense of place as those things that add up to a feeling that a community is a special place, distinct from anywhere else (Daniels 199), or something that results gradually and unconsciously from inhabiting a landscape over time, becoming familiar with its physical properties, accruing history within its confines (Ryden, 1983).

In the context of the World Heritage Site of Mapungubwe, our approach uses the definition as offered by Jackson (1984) who views it as a place, permanent position in both the social and topographical sense, which gives communities an identity. In this regard, sense of place is primarily about the human landscape, the human legacy of impact on the land, and memory. There are other characteristics about sense of place which include natural features, patterns of human settlement, and social relationships, since the connection between people is a key component of place, and something that is determined by local knowledge best expressed by the native population. In the case of Mapungubwe, sense of place would best be expressed by descent communities, although we acknowledge that it has also been part of the construct arising from centuries of layering, including colonialism.

Descriptions of place can take many forms, but one of the most effective, with respect to heritage management is an inventory of heritage resources. A comprehensive profile of both the natural and cultural landscape aids not only in preservation of existing resources, but can provide direction for future growth. Quantifying sense of place is, in our view, conserving those resources that make such a place unique (See Annexure XX, Visual Impact). Our approach here seeks to relate this concept with OUVs as presented above. In a landscape however, some places have a deeper sense of place when compared to others. For example, former capitals such as Mapungubwe Hill may evoke a deeper sense of place than the smaller sites. Thus the concept of sense of place is inextricably linked with significance.

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SUBMISSION OF THE VHANGOt::JA-VHAVENI;IA NATION

TO

COAL OF AFRICA LIMITED

VEL£ COLLIERY PROJECT

ON 02 JULY 2011 BY

MR T R RAKHADAN"

PRESIDENT OF THE VHANGO!JA NATIONAL  
CULTURAL MOVEMENT AND SPOKESPERSON  
OF HIS MAJESTY

KING TSHIDZIWELELt:

NEPHAWE XXXIII





## 1. A BRIEF HISTORY OF THE VHANGO A-YHAVENQA NATION

We the Vhangooa nation are the aboriginal[Indigenous] citizens of the land Vena of yore, then known as Lukungurubwe [now the SADC region]. The whole of this region was then commonly known as the Vhangol)a United Kingdom of Ven a.or Thovhele State as some affectionately called it, with the now internationally acclaimed and admired Mapungubwe Cultural Landscape as its capital. [See Annexure V3A,38,VNCM22]. This powerful and affluent Kingdom was led by His Majesty King Tshidziwefefeehpawe.(See Annexure V:1]. Our kingdom was composed of many district centres which were spread throughout its length and breadth, for example: Thophomabwe [now Matopo Hills], Great Zimbabwe, Khami, Ma/ungudzlof Mbedzi Matibe, Musiningira of Munyai Mabanga Phaswana, Ha-Mubvumela of Muronga [Maputo], ifurudzi of Munyai Mariwadu [Botswana], Ha-Muravha of MunyaM uravha [Marabastad-Pretoria], Mahenlof Mulovhedzi maheni [Mafikeng], Vhilavhila of Mukwevho J; Jevhllavhila [Bela Bela/ Warmbadi Warmbaths], Ha-Lutanga [Swaziland], Ha-Tshikororo of Mudau Jshikororo [Ga-S'kororo], Dzanani of edzanani [Tzaneen], Vhulovhedzi of Mulovhedzi Musehane/Rakushai [Bolobedu, now Mukwevho Modjadjii's domain], Lumbelule of Mbedzi Lumbelule (Lepelle), Bulugwane of Kwin a Mas vhelele Matshavha [Polokwane], Vhugogwa of Mudau tJev u ogwa (Botlokwa), Ha-Mugwabana of N<jou Mugwabana [Mokopane], Musina of Muleya J'::lemusina, Madzivhariombe of Mbedzi madzivhariombe [Giyani], Miyohelo of Matibeemiyohelo [Xikundu], Thulamela of Makahane. to mention but just only a few of them. Now all these and many other district centres were ruled by Mahosmahulu (paramount chiefs) who were deployed and controlled by their king, his majesty King Tshidziwelele of Mapungubwe. [See Annexure V3A&B].

The organogram of our royal leadership stands as follows:

THOVHELE [KING]

MAHOSMAHULU [PARAMOUNT CHIEFS]

MAHOSJ [SENIOR TRADITIONAL LEADERS]

MAHOSANA [HEADMEN]



VHAKOMA [PETTY HEADMEN]

Now the Vhangol)a have at least seven evolutionary names, each of which attests to the fact that we have been here for millions if not for billions of years [See Annexure V7]. These are:

Zwisike p.e. the original citizens/ aboriginal people/ autochthonous people/ first people]; It is common cause that all the other groups which have finally come here to make this land their home had left their countries of origin. Until today they can clearly recount how and why they decided to leave their countries and embarked on exiles until they landed here in Venc;fa, the land of the aboriginal Vhangol)a. So far there is no due or evidence as to the arrival of Vhangol)a in this land. From the late L. T. Marcie's Makhulukuku we read:

"Vha Ngol)a ndilushaka lu sa c; lihwizwavhuc; lihune vha bva vhe hone, hezwivha tshic; la kha he! ino! no pfi Venc;fa zwinol)amusl. A hu na lusevhe (lllwa muzwila we vha c;fa ngawo ,  
"(Marcie, 1966, 6)

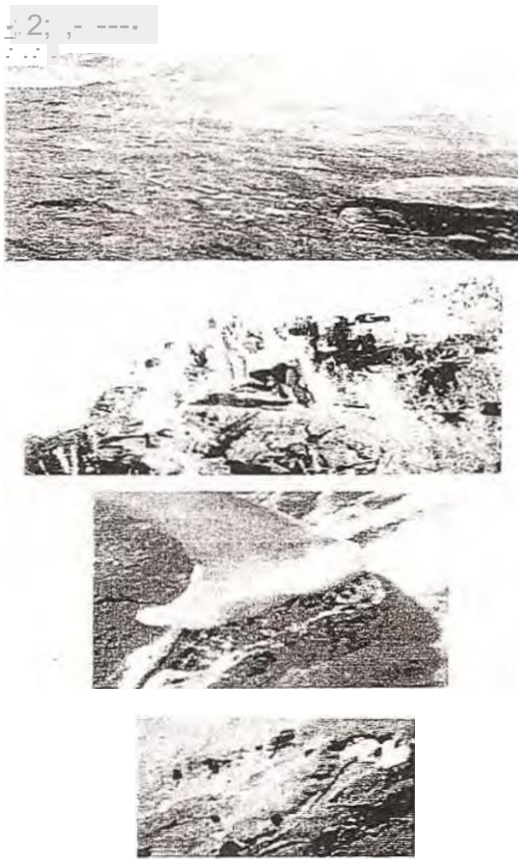
Now loosely translated, the above quotation would read something like this:-

"Now nobody really knows the origin of the Vhangol)a nation as we find them in what is today known as Venc;fa. There is virtually no idea or clue about how they happened to come here." [Marcie. 1966, 6].

Based on the above assertions therefore, suffice it to say that they are the aborigines, autochthonous, indigenous, first inhabitants, owners and rulers of Venc;fa.

MungoQa [owner of land teaming with meat (animals), i.e. Muthu wa shango J.a l)ama; *mu + ngo + JB* = Mungol)a;

Mubikwanaive [loosely translated It would mean the one who was cooked with the stone (i.e. one who witnessed the formation of *many* mountains and rocks during volcanic eruptions). This is further attested by both human and animal footprints on the rocks, which serve as testimony that the Vhangol)a have long been in this territory, so much so that *they* made such marks when the rocks were still soft warm.



Muvenqa (Ven.;la comes from Vele[seed/maize]!a u fhedza ■ a ; Ve + nlla= Venqa. I.e. the seed/maize that conquered hunger]. (Then Muvenqa means the owner of the fertile la1nd that produces the maize that conquers hunger);

Ngwaniwapo (one who was found already there];

Ntangiwakugata [the first to settle/live in a place];

Tshldzatshapo [the (local) graves which were found there.i.e.all over the entire kingdom by those who migrated into it]. Ilwere the Vhangol)a who.as the first inhabitants of the area.

gave names to all the rivers, mountains, trees, birds, grass, stones, places, throughout the entire kingdom, which names are still in existence even today albeit some having been corrupted. (See Annexure V14). Our ruins are round all over the land Vena or yore. We are the indigenous people of Lukungurubwe or southern Africa as it is known today.

Now the Vhangofa are easily identified amongst the other African nationalities by their family names/ mitupo or totems, and these are: N'ou (elephant), Mudau (ndau/lion) [e.g. Dau, Tau, Bataungj, Kwin a. Mukwevho [nguluvhe/kolobe, boar] (e.g. Modjadji the rain queen, Manamela, Kgopa, Muguboya, Sekgopo, Mamabolo etc.), Mbedzi (tivha/dzivha/IPOO) (e.g. Bakwena/Bakoena/Ngwenya, Mhlanga, Mlambo/Musikavanhu of Chipinge, Dzivaguru or Gwangwava-Mount Darwin, Matlabe of Mtetengwa, Madziva of Makoni! Maungwe County, Masunda of Ha-Shabaniphoreka of Mungariematombo of Hurungwe, Mutwiri of Inyanga, Moshoeshoe of Lesotho, etc.), Munya [pfe!] e/baboon] (e.g. Mathebuia. Baloyi Naloyi, Muravha, etc.), Mudzanani (pfe!) e/baboonj, Mutwanamba, Muleya, Muluvu, Mufamai [nguluvhelkolobelboar], Mulovhedzi Mu!arin [f] arVbuffalo], Munzhelele, Mu!avhatsindi [n'ou/elephant], Murundwa [n'Qou/elephant], Mulembethu, Khomola (l) arVbuffalo]. Now all the people who fall under these totems are Vhangofa, and therefore we believe they compose a very considerable percentage of the black population both in South Africa as well as in southern Africa.

We believe the Vhangooa nation also adequately meets the United Nations' definitions of indigenous or aboriginal peoples and their rights as recorded in the following documents:

Indigenous peoples [From Wikipedia, the free encyclopaedia]:

Indigenous peoples are people, communities and nations who claim a historical continuity and cultural affinity with societies endemic to their original territories that developed prior to exposure to the larger connected civilization associated with Western culture. These societies therefore consider themselves distinct from societies of the majority cultures that have contested their cultural sovereignty and self-determination.

They have historically formed and still currently form the minority/non-dominant sectors within majority-culture societies and are intentioned towards preserving, reviving, and enhancing the efficacy, cohesion and uniqueness of their traditional social values and

customary ties along with a conscientious effort to transmit this knowledge to future generations. This forms the basis of contemporary campaigns for reclamation of their own representational sovereignty and continued existence and recognition as peoples who desire to live according to their own cultural attributes, social systems and structures of law...

Other related terms for indigenous peoples include aborigines, aboriginal people, native people, first people, fourth world cultures and autochthonous. (Wikipedia-UN)

#### Who Are the Indigenous People and What Makes Them Different?

There does not seem to be one definitive definition of indigenous people, but generally, indigenous people are those that have historically belonged to a particular region or country, before its colonization or transformation into a nation state, and may have different—often unique—cultural, linguistic, traditional, and other characteristics to those of the dominant culture of that region or state.

In some parts of the world, there are very few indigenous people, while in other parts they may number into hundreds of thousands, even millions...

It is estimated that there are more than 370 million indigenous people spread across 710 countries world wide. Practicing unique traditions, they retain social, cultural, economic and political characteristics that are distinct from those of the dominant societies in which they live. Spread across the world from the Arctic to the South Pacific, they are the descendants—according to a common definition—of those who inhabited a country or geographical region at the time when people of different cultures or ethnic origins arrived. The new arrivals became dominant through conquest, occupation, settlement or other means...

#### Understanding the Term "Indigenous":

Considering the diversity of Indigenous peoples, an official definition of "indigenous" has not been adopted by any UN-system body. Instead the system has developed a modern understanding of this term based on the following:

- Self-identification as indigenous peoples at the individual level and accepted by the community as their member,
- Historical continuity with pre-colonial and/or pre-state societies.



- Strong link to territories and surrounding natural resources,
- Distinct social, economic or political systems,
- Distinct language, culture and beliefs,
- Form non-dominant groups of society,
- Resolve to maintain and reproduce their ancestral environment and systems and;
- distinctive peoples and communities.

#### Culture and Knowledge

Indigenous peoples are the holders of unique language knowledge systems and beliefs and possess invaluable knowledge of practices for the sustainable management of natural resources. They have a special relation to and use their traditional land. Their ancestral land has a fundamental importance for their collective physical and cultural survival as peoples. Indigenous peoples hold their own diverse concepts of development, based on their traditional values, visions, needs and priorities. [UNPFII-FACTSHEET]

#### Indigenous Rights, Issues and Concerns

Wherever indigenous cultural identity is asserted, some particular set of societal issues and concerns may be voiced which either arise from (at least in part), or have a particular dimension associated with their Indigenous status. These concerns will often be commonly held or affect other societies also, and are not necessarily experienced uniquely by Indigenous groups.

Despite the diversity of indigenous peoples, it may be noted that they share common problems and issues in dealing with the prevailing, or invading society. They are generally concerned that the cultures of indigenous peoples are being lost and that Indigenous peoples suffer both discrimination and pressure to assimilate into their surrounding societies. This is borne out by the fact that the lands and cultures of nearly all of the peoples listed at the end of this article are under threat. Notable exceptions are the Salcha and Komi peoples (two of the northern Indigenous peoples of Siberia), who now control

their own autonomous republics within the Russian state, and the Canadian Inuit, who form a majority of the territory of Nunavut (created in 1999).

It is also sometimes argued that it is important for the human species as a whole to preserve a wide range of cultural diversity as possible, and that the protection of indigenous culture is vital to this enterprise.

An example of this occurred in 2002 when the Government of Botswana expelled all the Kalahari Bushmen known as the San from their lands on which they had lived for at least twenty thousand years. President Festus Mogae has described the Bushmen as "stone age creatures" and a minister for local government, Margaret Nasha, likened public criticism of the revictim to criticism of the culling of elephants. In 2006, the Botswana High Court ruled that the Bushmen had a right to return to their land in the Central Kalahari Game Reserve.

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migrant peoples who came here as dissidents, hunters and gatherers, fortune-seekers, refugees, discoverers, traders, etc.; but to the first people [known as the Vhangochia] whose origin cannot be known save to say that they were found right there.

### Criteria for Involvement or Participation in this Project

We the Vhangochia participate in this project as the direct descendants of the owners and rulers of the Mapungubwe kingdom, not as an interested party or stakeholder. It will be a mistake for Coal of Africa just to try and bring in as many people as could be found interested whereas they disclaim any thorough knowledge of and have nothing to do with Mapungubwe.

Just as it happened during the preparations for the reburial process in 2007, we are still opposed to the blanket inclusion of different groups, simply because they claim that they belong there. If any group or individual claims their relationship with or connection to Mapungubwe, let them produce their history and/or anything that could show that they belong to it. Saying this we know full well that there are those like the Vhatwanamba of Tshivhula now subdivided into three families, namely: Tshivhula, Matshete and Dishivhula, as well as the Vhalemba group.

We need to prove it here and now that these groups cannot lay claim to Mapungubwe as belonging to them or any of their ancestors.

### A VHALEMBA

It is common cause that the Vhalemba are the Black Jews. Their country of origin is neither Venga nor any African country, they originated in Judea. (See Annexure VNCM 20 as attached).

Now according to Magdelle Raux, who did research among the Vhalemba, this is what we hear of them:

A preliminary investigation into the Semitic origins and missionary initiatives of some Lemba communities in southern Africa.

Magdelle Roux

#### ABSTRACT

"The Lemba live among other ethnic groups in southern Africa, but consider themselves to be Israelites who, after the Babylonian exile, migrated to Africa. The possibility that the Lemba might have a Semitic ancestry (embedded in an African culture) is further suggested by their preoccupation with religious practices like animal sacrifice, ritual slaughter, food taboos, circumcision rites, and endogamy. This article is primarily based on field research (participant observation and interviewing) among the Lemba people living mainly in the northern and eastern provinces of South Africa and in southern Zimbabwe. Attention is drawn to the way in which the identity of the Lemba is manifested through the traditions of their origin, some key cultural-religious practices (with an Old Testament resonance), the initiatives they took in their mission, and their assimilation into Christianity.

#### INTRODUCTION AND METHODOLOGY

The Lemba (also known as the Balemba, Basena, Bason!, Vamwenye, Varembe or Balepa) live among other tribes in southern Africa, speak the language of the populations surrounding them, attend local schools and hold positions in those communities. But their uniqueness lies in the fact that they regard themselves as being an offshoot of the Yemenite Jews, from a city called Sena (cf. Neh. 7:38 and Gayre of Gayre 1967:16), who centuries ago crossed the "Phusela" (although they do not know what Phusela was) and came to Africa. Here they rebuilt Sena, perhaps in more than one place, and helped to construct a great stone city which they identify as Great Zimbabwe (Mathliva 1992), the ruins of which have intrigued archaeologists for the last 100 years."

And one of their leaders, the late F C Raulinga, in a submission to the former Steering Committee on the Mapungubwe Human Remains Reburial confirmed what Roux said of them:

#### THE LEMBA RELIGION, CULTURE, TRADE AND HISTORY

##### 1. HISTORY

The Senas left Judea about six thousand (6 000) years ago during the riot of Nebuchadnezzar king of the Chaldeans of Babylonia (Mesopotamia) when the Jews were

taken into exile in the times of prophet Jeremiah about 586 BC. They left under the leadership of Buba (Judah) and settled in Yemen where they built the city of Sena named after Senaah in Judea, hence their name "senas", descendants of Senaah (Ezra 2:35, Nehemiah 8:38). Buba ruled in Sena. Hamisi succeeded Buba and ruled in Sena. Hamisi built the city of Phusela in Yemen. During his reign, Hamisi led the Senas across the red sea into Africa.

They divided into two groups, one group went to Ethiopia (Abyssinia), those are the Falashas. Hamisi led his group along the East Coast to the south and settled between Kenya and Tanzania under Hamisi. They named the place Sena II in remembrance of Sena I in Yemen. The Lembasi Senas lived at these places in Africa: Sena III in Delagoa Bay under Bakall, Chilambakufa in Zimbabwe under Seremane, Gokomele in Zimbabwe under Hamisi, Zimbabwe Hills under Tovhakale, Shabani Hills in Zimbabwe under Mhani, Mbelengwa mountains in Zimbabwe under Hadji where they were for the first time in Africa called Lembas in remembrance of the city of Lemba (Libba) near Jerusalem in Judea during the Maccabean (Judas Macabeus) rule about 168-63 BC, Ombusi Mountain in Zimbabwe under Sadiki.

#### B. VHATWANAMBA OF TSHIVHULA

It is common cause that the Vhatwanamba clan proper are Vhangooa. Even as we speak, in our movement, i.e. the Vhangooa National Cultural Movement, we have a number of Vhatwanamba who come from different royal families who are members of the organization.

Now according to the former Venda government ethnologist, the late Mr W M O Phophi, the Tshivhula people who are here now as stakeholders came from Rhodesia, and therefore cannot claim anything concerning Mapungubwe. [See Annexure VNCM 21 as attached].

Likewise, the Matshete and Tshivha people, who in any case are the younger brothers of today's Tshivhula, cannot really claim to belong to Mapungubwe save to say that they did stay there sometime, but having found the original residents there, although some of them had already left [See Annexure VNCM 22 as attached]



## 2. OUR SUBMISSION

Now It is a well-known fact that Mapungubwe is our national heritage. Not only is Mapungubwe one of the seven proclaimed World Heritage Sites in South Africa, but it has also gained international importance as a result of its rich cultural and historical significance. Mapungubwe also stands as a symbol of the highest honour in the land. This, rightly so since the erstwhile Mapungubwe Kingdom of the Vhangooa then ruled the entire sub-Saharan Africa, as well as the fact that it very well embodies our essence and pride of being blacks in general and of being VhangoQa-Vhavana in particular, and also the art, skill, wisdom, sophistication, civilisation and complexity of those our ancestors, the iron age and/or stone age people whose incredible and unprecedented success still baffles many today.

Now we believe that if the unconditional New Order Mining Right [NOMR] awarded to Coal of Africa were to go ahead, it would have an adverse impact and untold harm upon the World Heritage Site status of Mapungubwe, which might compel the United Nations to withdraw such status. Not only that, Mapungubwe is our national heritage, the pride of all Africans: in general, and in particular the blacks, not only those in South Africa but across the entire continent. Now any disturbance to the ecosystem, the fauna and the flora, the hundreds of thousands of the remains of our ancestors, as well as the entire trans-frontier park environment and population, just for the sake of short term profit gains by a small group of selfish capitalists, naturally attracts criticism and objection by all who love their heritage. A project with a projected lifespan of between twenty to thirty years, yet it is expected to destroy the VhangoQa-Vhavenga's heritage, which took our ancestors centuries to build. Mining and ecotourism cannot co-exist, neither are we prepared to see the latter disturbing the former in any way. This heritage was handed down to us by those who traversed this land since time immemorial, and which took countless generations to be built. We therefore don't see any reason why it should be destroyed now and in the process, we become the ones who have decided to rob future generations of the heritage meant for them both by God Almighty and by the ancestors.

May we also draw the attention of Coal of Africa and perhaps any other interested party to the fact that not only are we claiming that Mapungubwe is our heritage. We are not only verbally claiming it. Right now as we speak, our King, His Majesty, the Honourable Mr. N. Tshidziwelelephawe has lodged a land claim on Mapungubwe with the Regional Land Claims Commission. And we are only waiting for the Commission to conclude its work on

the issue. It is only we the Vhar.gola who have and who can make any such claim let the sacred site. We have again made a kingship claim with the Commission on Traditional Leadership Claims and Disputes, and as we speak, the matter is about to be finalised by the High Court, since there was some meddling as far as the Commission results we're concerned.

## Tourism versus Mining

We need to inform Coal of Africa that Mapungubwe is our heritage and shrine as a nation. Mapungubwe means more than the erstwhile capital city of our kingdom. It must be realised that our ancestors still lie there, hence our involvement in the reburial process in 2007. [See Annexure V6A]. Mapungubwe is our nation's sacred site. Those of us who still believe in ancestral worship do visit the place from time to time to perform their rituals there. So we don't see any reason why this should be disturbed by the envisaged mining project.

So far as the VhangoQa, the bon fide descendants of the owners of the Mapungubwe area, are relatively satisfied with Mapungubwe being used as a tourist attraction, since this does not harm the environment in any feasible way. It is our belief that if the mining project were to go ahead, tourism development in the Mapungubwe Cultural Landscape will be negatively affected by the round-the-clock lighting, blasting and noise and these will destroy the sense of the place in a permanent way, and it goes without saying that the same will also apply to the sustainable job opportunities from tourism and tourism growth. This project is totally incompatible with tourism activities, and should therefore be objected to.

Everyone of us knows that Coal of Africa is an Australian company. It is common cause that the government of Australia recognises both the aboriginal people of that country, their rights and their sacred sites. But we find it ironic that Coal of Africa is adamant that they want to do mining here at Mapungubwe, even when we as the aborigines here are unequivocally saying that they shouldn't. Imagine if we were to go to Australia today to do mining at Ayer's Rock. And when the people objected to this, we would calm them down by saying that we were going to create lots of jobs for the aborigines, give their children bursaries and pay some royalties to their trust funds. It must be borne in mind that Mapungubwe is the cultural capital of both South Africa and the southern African region as a whole. So if this initiative were to go ahead, we will continue to oppose it since we were

not consulted at its inception, and we don't understand why it should be done exactly where it is now envisaged.

Now Chapter Two, Section 24 of our country's democratic Constitution makes provision for the protection of the heritage and environment for future generations where it says:

#### Environment

Everyone has the right-

- (a) "To an environment that is not harmful to their health or wellbeing, and
- (b) To have the environment protected, for the benefit of present and future generations, through reasonable legislative and other measures that:
  - (i) prevent pollution and ecological degradation;
  - (ii) promote conservation; and
  - (iii) secure ecologically sustainable development and use of natural resources while promoting justifiable economic and social development."

It is therefore our submission as Vhangoni a Vhavenga nation that we are not opposed to the issue of mining as such, nor are we oblivious of the fact that there are lots of financial spin-offs to some people, as well as the much needed job creation. All we are saying is that as an Australian Company, Coal of Africa would never do mining on the shrines or sacred sites of the aboriginal people in its mother country. And so we don't understand why the same should be done here, right at the doorstep of our home town! And if this project were to go ahead against this background, it would therefore be tantamount to both cultural and racial prejudice. And we will under no circumstances allow any such activities to be carried out on our cultural landscape without resistance. Mapungubwe is our heritage! We will never let go of it no matter what reward is offered!

And to substantiate this further, we quote from the former Vanga administration's Commission on Land Matters which wrote to the then white South African regime and said:

"Before the decision-makers of the Republic of South Africa, embark on the delicate issue of determination of boundaries, we wish to sound a warning that any land arrangements which excluded historical and traditional considerations, were the source of friction, misunderstandings and wars throughout the ages. To substantiate this statement does not require any intensive research as all historians and politicians are aware of the mistakes committed by the delegates who assembled in Vienna in 1815 and at Versailles in

1919 In which settlements, territorial arrangements remained a sore in the hearts of the dispossessed. The vanquished nations had no alternative but to bear the brunt for some moments, and when time came, took up arms to regain the lost territories...•

We therefore would like to furthermore plead with our government to withdraw the license given to Coal of Africa as soon as possible. They can get any other place to do their mining, not at and/or around Mapungubwe, otherwise if this were to get ahead, the courts of law would have to be approached for assistance. This also applies to any other intended or prospected mining activity in and around Mapungubwe. We will always oppose any such activities. We are also aware that we are never consulted when issues affecting Mapungubwe are being discussed. We find this very much unfair and so we condemn it in the strongest terms.

Thus signed:

Name	Designation	Signature	Date
<del>Mr. T. R. Rakhehane</del>	<del>VNOM President</del>	<del>[Signature]</del>	02.07. 011
Mr. M. N. Tshilande	VNOM Deputy President	[Signature]	02.07.2011
Mrs. F. C. Kwinga	Secretary General	[Signature]	02.07.2011
Mr. Netshisaulu	<del>Dep. Secretary General</del>	<del>[Signature]</del>	02.07.2011
Mr. R. Luvhimbi	Publicity Secretary	[Signature]	02.07.2011

## 6.5. Map plans of Vele Colliery

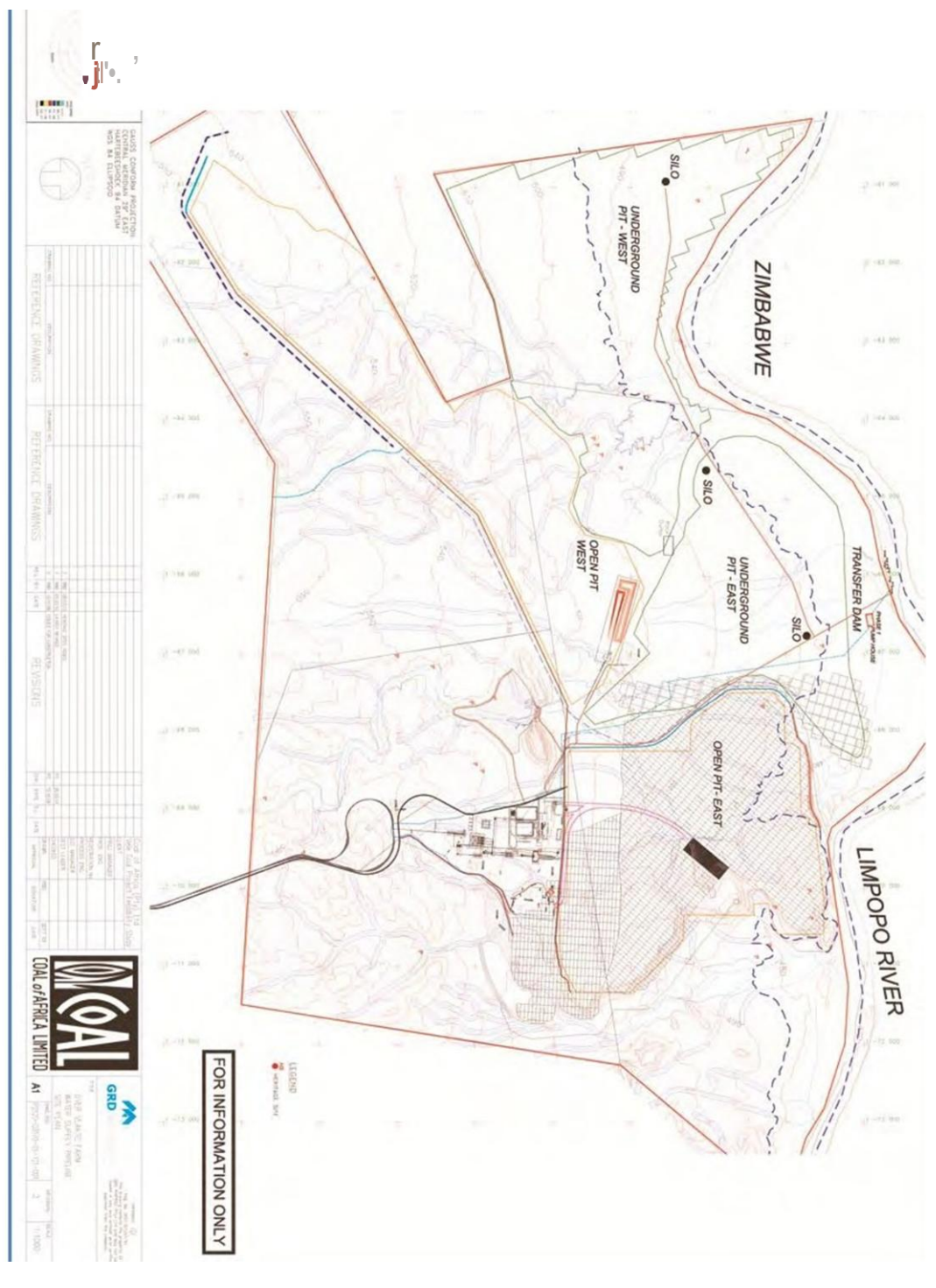
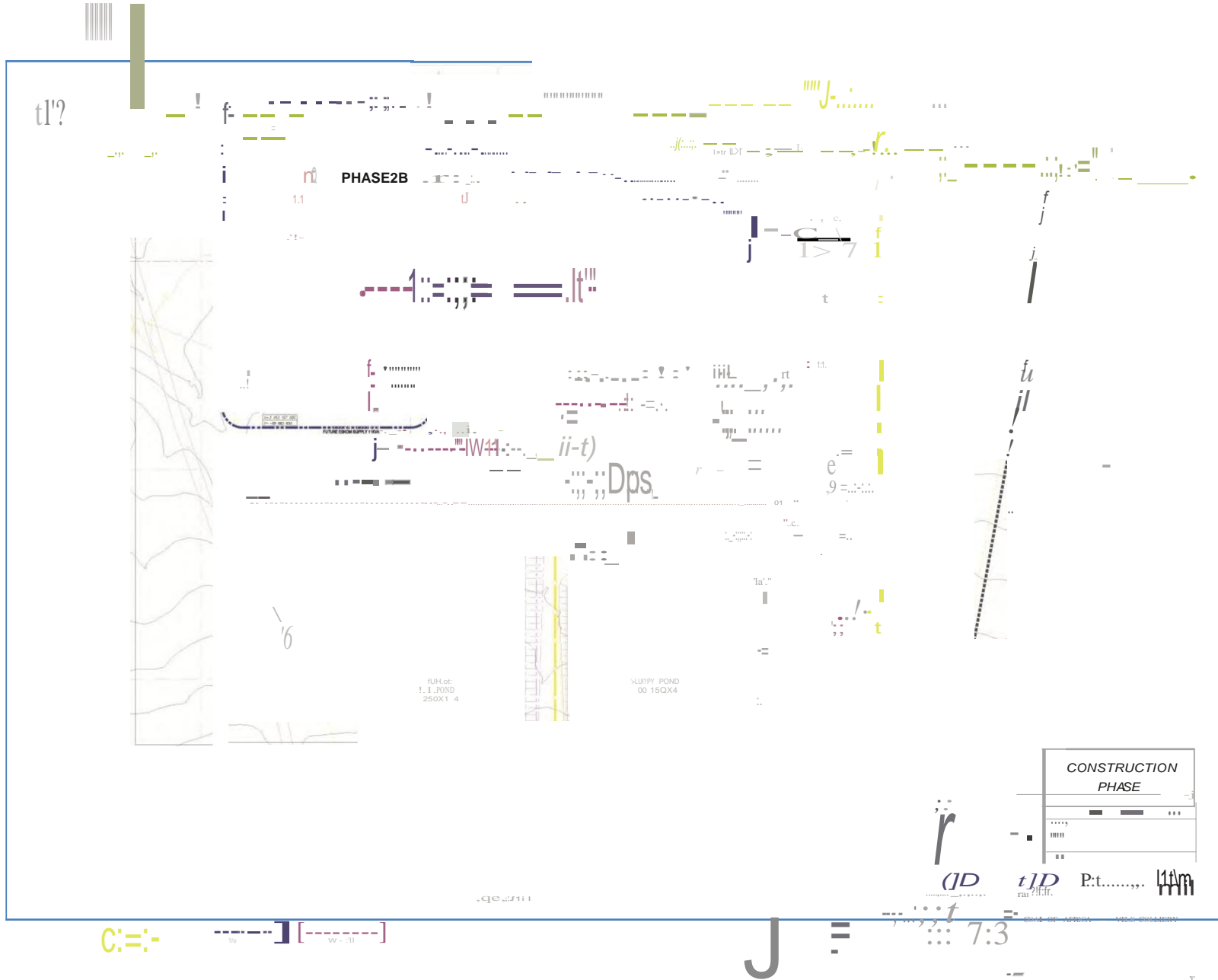


Figure 29. Site plan over the planned mining areas of Vele colliery. Map: Coal of Africa.





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Figure 31. Map of new transport road at Vele (see photo in figure 15). Map:Coal of Africa.