



Messrs. Sharples Environmental Services  
Table View  
Cape Town

Attention: Ms. A. Sanker

**PROPOSED EXPANSION OF THE MELKHOUTFONTEIN CEMETERY ON ERF 566 AND PORTION 141/480, HESSEQUA LOCAL MUNICIPALITY.**

Your Email with attachment dated 09<sup>th</sup> November 2020 concerning the above mentioned refers.

1. The proposed expansion as well as the existing site is already stated in the draft report that a potential for ground water pollution is high.

2. Cemeteries are ideally situated where the water table is low, and at an acceptable distance from water sources such as rivers to avoid contamination.

3. In terms of Section 15(2) of the Regulations relating to the Management of Human Remains, R363 of May 2013, all burial sites must comply with the following environmental requirements: -

(a) Be located outside the 100-year floodplain;

(b) Be located at least 350 m from ground water sources used for drinking purposes and at least 500 m from the nearest habitable building;

(c) For a preferred burial site with a soil of sand-clay mix of low porosity and a small and fine grain texture, the water table should be at least 2.5m deep in order to allow for traditional grave depth of 1.8 meters;

(d) For areas with higher water tables, the local government may determine a reasonable depth with additional walling recommendations to protect underground water; and

(e) The covering soil shall not be less than 1 m, should two bodies be buried in the same grave, 300mm of soil shall be maintained between the coffins.

4. Exemptions to these regulations – Regulation 2 (2):

(a) A local government may, with the approval of the Director-General, in writing exempt any person from compliance with any provisions of these regulations where, in the opinion of the local government, non-compliance does not or will not create a health nuisance, health hazard or endanger human health; and that

(b) Such exemptions shall be subject to such conditions and valid for such a period as the local government may, with the approval of the Director-General or delegated person, lay down and stipulate.

(c) A local government must issue a certificate of exemption to a person, for exemption of any provision of these regulations.

**5. If any of the requirements referred to under point three (3) of this Notice cannot be met, the Section Municipal Health Services must be informed and needs to apply for approval from the Director General of the Department National Health to exempt the Hassequa Municipality from any non-compliances in terms of Regulation 15(2).**

6. Over and above the set requirements / recommendations in the Environmental Management Programme, Geohydrological and geotechnical assessment etc., this Office Concurs with the recommendations of the study on Geohydrological and Geotechnical Assessment namely that:

(a) Strict mitigation measures and groundwater monitoring plan should be implemented to prevent surface or ground water pollution due to any actions on the site as per the applicable requirements with respect to relevant legislation pertaining to water must be met.

(b) The aquifer developed for Melkhoutfontein is of strategic importance and requires strict protection.

(c) The cemetery expansion should only be allowed in the case that no abstraction takes place within 250 m of the cemetery.

(d) Irrespective of whether the cemetery expansion occurs, the groundwater monitoring recommendations should be implemented for the current cemetery.

(e) Should the cemetery expansion occur, the proposed expansion will need to conform to the standard industry mitigations measures for developing a cemetery in order to minimize contamination on site.

(f) The recommended monitoring of the groundwater system on site.

7. Further to that the following must be complied to.

(a) Any solid waste must be disposed of at a waste disposal facility licensed in terms of applicable legislation.

(b) The applicable requirements with respect to relevant legislation pertaining to occupational health and safety must be adhered to.

(c) The holder of the Environmental Authorisation must always ensure that the construction activities comply with the Noise Control Regulations in terms of the relevant legislation, namely –

(d) All noise and sound generated during all phases of the proposed development, as well as during the operation of the Cemetery, must comply with the relevant SANS codes and standards.

(e) Adequate ablution facilities must be provided on site during construction. The ratio of 15 people per ablution facility must not be exceeded.

8. Notwithstanding the Environmental Authorization, the holder must comply with any other statutory requirements that may be applicable when undertaking these activities.

9. Good practices will also include the maintenance of norms and standards, having a good set of by-laws, and having electronic software to assist the Municipality in cemetery management.

10. Therefore there is no objection to the expansion subject to compliance to all of the above.

Yours faithfully



**DISTRICT MANAGER: GARDEN ROUTE AND CENTRAL KAROO**

**DATE: 08 January 2021**

Melkhoutfontein Cemetery On Erf 566 And Portion 141/480,  
Hessequa Local Municipality.