



an agency of the  
Department of Arts and Culture

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CaseID: 12039

Date: Thursday July 05, 2018

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## Interim Comment

**In terms of Section 38(8), 38(4) of the National Heritage Resources Act (Act 25 of 1999)**

Attention: Stonewall Mining (Pty) Ltd

**Transvaal Gold Mining Estates Limited (TGME), a subsidiary of Stonewall Mining (Pty) Ltd, is applying to rework Pre-Mined Residue (PMR) mines in the Pilgrims Rest area of Mpumalanga, which will form part of a larger project named the TGME Mine Development project (Project 101671).**

Transvaal Gold Mining Estates Limited are, a subsidiary of Stonewall Mining (Pty) Ltd, proposing to expand on their existing mining operations and to rework their Pre-mined Residue. They are also proposing to mine for Zinc ore, Copper ore, Bismuth ore, Stone Aggregate (from waste rock dump), Iron ore, Silver ore and Gold ore. Infrastructure to be constructed will include, diesel storage area, engineering workshop, sewerage treatment plant, change house, offices, shaft head infrastructure, haul roads and access roads.

Globesight Environmental Consulting (Pty) Ltd have been appointed by TGME to undertake the Scoping and Environmental Impact Assessment (S&EIA) process in support of an Environmental Authorisation application in terms of Environmental Impact Assessment (EIA) 2014 Regulations, of the National Environmental Management Act, no 107 of 1998 (NEMA) and listed activities in the Minerals and Petroleum Resources Development Act, 28 of 2002 (MPRDA), as amended. They have submitted a Draft Environmental Management Programme report (EMPr), a Heritage Impact Assessment (HIA) has been submitted to SAHRA, for commenting in terms of section 38 (8) of the National Heritage Resources Act, 25 of 1999 (NHRA). This application is related to another application on SAHRIS (Case ID 12038).

*Van Schalkwyk, J.A. September 2017. Phase 1 Cultural Heritage Impact Assessment: Proposed "TGME Mine Development Project (10161)": Gold Mining Projects in Terms Of Pre-Mined Residue and Hard Rock Mining, Pilgrim's Rest Region, Mpumalanga Province.*

The author undertook a field survey of the farms for the TGME mine right area and identified 11 heritage sites consisting of the old TGME mine infrastructure, offices, adits, burials, power lines, farmsteads and homesteads. The mine has been existence since the late 19<sup>th</sup> Century making most of these sites either archaeological or historical and related to the Pilgrims Rest Gold Mining Heritage. The following sites were identified:

Archaeology: No archaeological sites have been identified close to these mine sections. However should sites



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Ns 01 and 03 require mitigation, the adits must be permitted under section 35 and work done by an archaeologist familiar with colonial mining history.

Built Environment: Site WeN 01 is a mine structure of High to Medium significance; Mv 02 is a mine feature of High significance; Ns 01, Ns 03 are historical mine adits of High significance; MiH 01 and MiH 02 are historical mine adits of low significance; Ns 02 and 04 to 06 are historical houses considered of low heritage significance; and Sh 01 is a historical house structure of low historical significance. The structures would require comments/permits from the Mpumalanga Provincial Heritage Resources Authority (MPHRA);

Burial Grounds and Graves: SoH 01 contains over 52 burials, with some of them being over 60 years in the ground. This cemetery is located outside the mine right area and far away from any access road, it will not be impacted by mining activities; all graves are of high significance. It should be noted that the site must be monitored annually for any damage from blasting activities.

The author recommends mitigation of sites that cannot be conserved *in situ*, and development of a Heritage Conservation Management Plan to manage the long term conservation of all the site that will be conserved *in situ*. One consolidated Heritage CMP can be developed for all the TGME mine right areas. Further recommendations include:

### Interim Comment

SAHRA Archaeology, Palaeontology and Meteorites (APM) Unit in consultation with the SAHRA Built Environment (BEU) Unit does not agree with the significance rating and the recommendations provided within the HIA report. For instance, sites Ns01 and Mv o3 should have a higher field rating significance rating than the one given (ie. Grade IIIB). Also SAHRA cannot fully assess the impacts of the mine re-opening on the very significant historical mine and town of Pilgrim's Rest, because the HIA does not assess the historical mining landscape of the town of Pilgrim's Rest and mine itself. The report also does not mention the ages of the mine and the mining structures. If any of the mining infrastructure is over 100 years, they will be managed as archaeological sites.

Furthermore, the report does not take into account the fact that Pilgrim's Rest was on the UNESCO World Heritage Site tentative list. The HIA does not contain the finalised plans for all the mining infrastructure,, particularly all the surface infrastructure in relation to the identified heritage sites.

SAHRA requires the HIA to be amended to assess all of the above.

The HIA does not contain finalised mine layout plans, and does not specify which features will be conserved *in situ*.

SAHRA *in principle*, has no objections to the mine re-opening as it will add to the regions historical

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significance however, the HIA must be amended to assess all of the above.

The mine right area is located in a Very Highly to Moderate palaeontological sensitive area, a field based Palaeontological Impact Assessment must be done before the mine goes into construction phase.

SAHRA awaits the submission of the PIA report and an amended HIA report before the case is processed further.

Should you have any further queries, please contact the designated official using the case number quoted above in the case header.

Yours faithfully

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Nokukhanya Khumalo  
Heritage Officer  
South African Heritage Resources Agency

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Phillip Hine  
Acting Manager: Archaeology, Palaeontology and Meteorites Unit  
South African Heritage Resources Agency

**ADMIN:**

Direct URL to case: <http://www.sahra.org.za/node/487390>

(, Ref: )

**Terms & Conditions:**

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1. This approval does not exonerate the applicant from obtaining local authority approval or any other necessary approval for proposed work.
2. If any heritage resources, including graves or human remains, are encountered they must be reported to SAHRA immediately.
3. SAHRA reserves the right to request additional information as required.