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CaseID: 12264

Date: Wednesday March 07, 2018

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Interim Comment

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

Attention: Imerys Refractory Minerals South Africa

The basic assessment report is part of decommissioning of the Havercroft Operation. Havercroft Operation forms part of the mining right of Annesley Mine. The commodity type that was mined at Havercroft is an aluminum nesosilicate mineral called Andalusite (Al₂SiO₅). Decommissioning will take place on the farm Streatham 100 KT, and the farm Havercroft 99 KT in the Sekhukhune District Municipality and Greater Tubatse Local Municipality, Limpopo province.

Imerys Refractory Minerals South Africa (Pty) Ltd have appointed BECS Environmental (Pty) Ltd to undertake a basic assessment process for the decommissioning of the Havercroft Mining Operations at the Havercroft Mine. The extent of the operations will be 8 183.3 ha located on the farms Streatham 100 KT and Havercroft 99 KT, in the Greater Tubatse Local Municipality of the Limpopo Province.

A draft Basic Assessment Report (BAR) has been submitted for commenting to SAHRA in terms of the National Environmental Management Act, 1998 and The National Environmental Management Waste Act, 2008 in respect of listed activities that have been triggered by applications in terms of the Mineral and Petroleum Resources Development Act, 2002 (MPRDA) (As Amended).

In terms of the National Heritage Resources Act, no 25 of 1999 (NHRA), heritage resources, including archaeological or palaeontological sites over 100 years old, graves older than 60 years, structures older than 60 years are generally protected. They may not be disturbed without a permit from the relevant heritage resources authority. In contexts of development applications, the developer must ensure that no heritage resources will be impacted by the proposed development, by lodging an application to SAHRA and submitting detailed development specifications as a notification of intent to develop. If the application is made in terms of s. 38 (8) of the NHRA then it is incumbent on the developer to ensure that a Heritage Impact Assessment (HIA) is undertaken, as s. 38(2)a does not apply. Such a study should follow the SAHRA 2007 impact assessment guidelines and section 38(3).

The BAR mentions that all heritage resources within the mine area will be managed as part of the EMPr however, there is no mention of how many heritage sites identified in the mine right area. The initial HIA conducted for the mine right application, must be submitted to the case along with SAHRA's comments. Also, the 2006 EMPr mentioned in the BAR must be submitted to the case.

Our Ref: 12264



an agency of the
Department of Arts and Culture

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SAHRA will provide further comments on the case once the above requested documents are submitted to the case.

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

Yours faithfully

Nokukhanya Khumalo
Heritage Officer
South African Heritage Resources Agency

Phillip Hine
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South African Heritage Resources Agency

ADMIN:

Direct URL to case: <http://www.sahra.org.za/node/488540>

(, Ref: 73 MRC)