



an agency of the  
Department of Arts and Culture

T: +27 21 462 4502 | F: +27 21 462 4509 | E: info@sahra.org.za  
South African Heritage Resources Agency | 111 Harrington Street | Cape Town  
P.O. Box 4637 | Cape Town | 8001  
www.sahra.org.za

Enquiries: Nokukhanya Khumalo

Tel: 021 462 4502

Email: nkhumalo@sahra.org.za

CaseID: 13227

Date: Tuesday March 26, 2019

Page No: 1

## Interim Comment

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

Attention: Anglo Operations (Pty) Ltd

PO Box 61587  
Marshalltown  
2107

**Anglo Operations (Pty) Ltd: Greenside Colliery proposes to expand their current underground mining operations into a south eastern direction (East Block area) on Portion 2, 3 and the RE of the farm Groenfontein 331JS and Portions 1, 27, 28 and 45 of the farm Klipfontein 322JS, Emalahleni Local Municipality, Mpumalanga Province.**

Anglo Operations (Pty) Ltd Greenside Colliery is proposing to expand their existing operations into the East Block underground mining area. They will be using the Board-and-Pillar method for the extraction of the coal reserves which will be taken by conveyor belt to the existing coal beneficiation plants. The colliery is located on Portions 1,2,3 and the remainder of the farm Groenfontein 331 JS; Portions 1, 29 and the remainder of Blaauwkrans 323 JS; the remainder of the farm Weltevreden 324 JS; and Portions 7, 9, 10, 12, 13, 14, 15, 16, and 17 of the farm Vlakraagte 330 JS. Which they are all located in the eMalahleni Local Municipality of Mpumalanga Province. East Block underground mining area is located on Portions 2, 3 and the remainder of the farm Groenfontein 331 JS, which will combine with the approved underground mining areas for the Klipfontein mine. Whereby on East Block, they will be constructing a ventilation shaft and power line, a downcast shaft as part of the surface construction activities.

Shangoni Management Services (Pty) Ltd have submitted a draft Scoping report to inform the South African Heritage Resources Agency (SAHRA) of the Environmental Authorisation application, made on behalf of the applicant, Anglo Operations (Pty) Ltd Greenside Colliery. The Environmental Impact Assessment (EIA) application process is in respect of listed activities in the EIA Regulations 2014, as amended, that require an application for Environmental Authorisation in terms of the National Environmental Management Act, 1998 (NEMA). A Water Use License in terms of the Water Use Licence Regulations, March 2017 in terms of the National Water Act, 36 of 1998 and a mine right in terms of section 16 of the Mineral and Petroleum Resources Development Act, 2002 (MPRDA) (As amended). A Scoping Report has been submitted to SAHRA in terms of section 38(8) of the National Heritage Resources Act, 25 of 1999 for commenting.

Our Ref: 13227



an agency of the  
Department of Arts and Culture

T: +27 21 462 4502 | F: +27 21 462 4509 | E: [info@sahra.org.za](mailto:info@sahra.org.za)  
South African Heritage Resources Agency | 111 Harrington Street | Cape Town  
P.O. Box 4637 | Cape Town | 8001  
[www.sahra.org.za](http://www.sahra.org.za)

Enquiries: Nokukhanya Khumalo

Tel: 021 462 4502

Email: [nkhumalo@sahra.org.za](mailto:nkhumalo@sahra.org.za)

CaseID: 13227

Date: Tuesday March 26, 2019

Page No: 2

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 Minimum Standards: Archaeological and Palaeontological Components of Impact Assessment Reports and section 38(3) of the NHRA.

It is noted that a 2014 Heritage Impact Assessment has been summarised in the draft Scoping Report. The HIA had identified 3 cemeteries which will not be impacted, and Scoping Report determines the overall heritage impact to be low with mitigation. However an assessment of Palaeontology is not included in the Scoping Report.

### **Interim Comment**

The South African Heritage Resources Agency (SAHRA) Archaeology, Palaeontology and Meteorites (APM) Unit requires that an archaeologist is appointed to conduct a Heritage Impact Assessment for the proposed activities that are being applied for in this EIA application. If the appointed specialist finds a field assessment not necessary a desktop Heritage Impact Assessment motivating for an exemption from a field assessment must be compiled and submitted to the case.

As the development is located in a very high palaeontological sensitive area as seen on the palaeo-map, a Palaeontological Impact Assessment must be conducted by a suitably qualified palaeontologist.

SAHRA awaits the submission of the requested heritage reports along with the environmental reports and the appendices, before commenting further.

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

Yours faithfully

**Our Ref: 13227**



an agency of the  
Department of Arts and Culture

T: +27 21 462 4502 | F: +27 21 462 4509 | E: [info@sahra.org.za](mailto:info@sahra.org.za)  
South African Heritage Resources Agency | 111 Harrington Street | Cape Town  
P.O. Box 4637 | Cape Town | 8001  
[www.sahra.org.za](http://www.sahra.org.za)

Enquiries: Nokukhanya Khumalo  
Tel: 021 462 4502  
Email: [nkhumalo@sahra.org.za](mailto:nkhumalo@sahra.org.za)  
CaseID: 13227

Date: Tuesday March 26, 2019

Page No: 3

---

Nokukhanya Khumalo  
Heritage Officer  
South African Heritage Resources Agency

---

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/515068>  
(DMR, Ref: )