



## Interim Comment

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

Attention: Main Street 800 (Pty) Ltd  
12th Floor  
Nedbank Building  
81 Main Street

Marshalltown

**Main Street 800 (Pty) Ltd “the Applicant” has targeted an anthracite resource in the Mpumalanga Province near the town of Komatipoort for the development of an opencast and future underground anthracite mining operation. KaNgwane is situated 40km south east of the Komatipoort and 100km south west of the Mozambique border. KaNgwane falls under the jurisdiction of the Nkomazi Local Municipality. The residential areas and settlements surrounding KaNgwane include Sibayeni, Ka-Sibhejani, Emangweni and KwaZibukwane. KaNgwane is located over the farms 476 – 478 and 485 JU.**

*van Vollenhoven, A. November 2011. A Report on a Cultural Heritage Baseline Study for the Proposed Kangwane South Anthracite Mine, close to Komatipoort, Mpumalanga Province*

*van Vollenhoven, A. October 2012. A Report on a Cultural Heritage Impact Assessment for the Proposed Kangwane Anthracite Mine, close to Komatipoort, Mpumalanga Province*

Thank you kindly for the above heritage reports submitted in support of the proposed opencast and future underground anthracite mining operation situated 40km south east of the Komatipoort and 100km south west of the Mozambique border. The area was surveyed extensively for heritage resources and it is noted that the area has been previously disturbed by human activities.

The submitted studies identified three sites. Site 1 consists of the remains of buildings and a farm dam and is of low heritage significance. Site 2 consists of Middle and Later Stone Age material as well as Iron Age pottery. A possible Iron Age midden with associated faunal material was identified nearby. This site was identified as having high heritage significance. According to the submitted report, the proposed mines pollution control dams will impact negatively on this significant site. Middle Stone Age artefacts and Iron Age pottery were also identified at Site 3, however these have low heritage significance.

It is noted that no palaeontological impact assessment has been completed for this proposed development. According to the submitted Draft EIA, the geology of the proposed site consists predominantly of the fine-grained mafic lava of the Letaba Formation of the Lebombo Group of the Karoo Sequence. It also includes the Tshipise Member of the sandstones of the Clarens Formation of the Lebombo Group of the Karoo Sequence. Ichnofossils have been found in this unit.





SAHRA accepts the submitted reports and endorses the goals outlined on page 249 of the Draft EIA under item 11.3.2 which indicates that the mine commits to protecting the heritage resources identified at Site 2. As such, Site 2 must be conserved *in situ* and may not be negatively impacted by the proposed development.

A Palaeontological study must be undertaken to assess whether or not the development will impact upon significant palaeontological resources. Alternatively, a letter of exemption from a Palaeontologist is required to indicate that this is unnecessary. If the area is deemed sensitive or if significant heritage is identified, a full Palaeontological Report may be required.

Should it not be possible to adhere to the above conditions, the applicant must consult with SAHRA regarding the reasons for non-compliance. In this instance, on SAHRA's advice, other mitigation strategies may have to be adopted which will require following a process for archaeological or palaeontological investigation in terms of Section 35 of the NHRA (Act 25 of 1999).

SAHRA looks forward to receiving this heritage report and will provide comment before the project can commence.

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

Yours faithfully

Jenna Lavin  
Heritage Officer  
South African Heritage Resources Agency

Colette Scheermeyer  
SAHRA Head Archaeologist  
South African Heritage Resources Agency



**Our Ref: 9/2/203/0026**

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CaseID: 1366

Date: Wednesday March 06, 2013

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**ADMIN:**

(DMR, Ref: MP 30/5/1/2/3/2/1 (482) EM ) (DT, Ref: 17/2/3/E-154)

**Terms & Conditions:**

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.



The South African Heritage Resources Agency

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