



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: 14681

Date: Thursday February 27, 2020

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## Interim Comment

### In terms of Section 38(3), 38(8) of the National Heritage Resources Act (Act 25 of 1999)

Attention: Barberton Mines (Pty) Ltd

### Proposed construction of the Fairview TSF and reclamation of material from historic dumps in the Fairview Mining Right Area near Barberton, Mpumalanga

Barberton Mines (Pty) Ltd appointed Cabanga Environmental to undertake an Environmental Impact Assessment (EIA) for Environmental Authorisation of the development of the Fairview Tailings Storage Facility (TSF) and reclamation of historical dumps on Fairview Mining Rights Area in Mbombela Local Municipality of the Ehlanzeni District Municipality in the Mpumalanga Province.

The application is for the amendment of the existing Mining Right (MP/30/5/1/2/2/191 MR) to:

- Incorporate the Fairview Surface rights areas where existing Mine Infrastructure is located and ensure the activities occurring at the Fairview Mine are all integrated under one Right, and managed under one EMP;
- Accommodate the construction of the new Fairview TSF, at the site of the reclaimed Bramber TSF; and
- Accommodate the recovery of material from Ten (10) historic waste dumps and re-processing of this material at the existing Fairview processing plants.

An interim comment dated 24/01/2020 and a letter dated 07/02/2020 was issued requesting that the impact on the geosites be assessed by a suitably qualified geologist.

Van Rooyen, K.C. of Cabanga Environmental (Pty) Ltd has provided the geological heritage specialist input as part of the EA process as per section 38(3) and 38(8) of the National Heritage Resources Act, Act 25 of 1999 (NHRA) as required by section 24(4)b(iii) of NEMA

The closest geosite included in the WHS is approximately 4.5 km linear distance from the proposed activities. The closest identified geosite to the project activities is approximately 500 m (this area was excluded from the WHS inscription). It is considered unlikely that geosites will be affected by the proposed project activities at all, considering that the dumps targeted for reclamation are located on surface, predominantly in drainage lines and not on outcrops. Underground mining in this area has already occurred in terms of the existing and

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approved Mining Right.

It is recommended that the proposed reclamation activities are strictly limited to the previously disturbed footprints associated with the target dumps.

### Interim Comment

The SAHRA APM unit notes the Geological Impact Assessment report and the recommendations provided therein. The SAHRA however does not accept the report as it does not address what was required in the previous comment dated 24/01/2020. The report assessed the possible impacts to the National Heritage Sites, however it did not assess the geology of the area for similar sites of significance.

Consultation with the Barberton Mkonjwa Mountain Management Authority and Mpumalanga Parks Board as previously requested was not done. This consultation must be included in the HIA report and must be undertaken by the archaeologist who will amend the HIA report to take into account the overall Heritage Impact Assessment and to take into account the consultation results and the significance assessment of the historic dumps as the mine dumps are all older than 60 years and thus are protected under the National Heritage Act (25 of 1999).

The SAHRA advises the EAP to make an application to the competent authority in terms of section 21(1)b of the NEMA EIA Regulations to extend the EA process to amend the report to comply with the comment.

Considering the age of the dumps, a section 34 or 35 permit, depending on the age, must be applied for prior to the reclamation going ahead. The age of each dump must be confirmed and included in the permit application.

Any dumps over 100 years must undergo a 35 NHRA permit application, application will be processed by SAHRA and any dumps younger than 100 will be processed under section 34 and applied to the MPHRA.

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

**ADMIN:**

Direct URL to case: <http://www.sahra.org.za/node/532282>  
(DMR-MP, Ref: MP/30/5/1/2/2/191MR)

**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.