



an agency of the
Department of Arts and Culture

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South African Heritage Resources Agency | 111 Harrington Street | Cape Town
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CaseID: 15466

Date: Wednesday October 21, 2020
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Interim Comment

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

Attention: Sasol Mining (Pty) Ltd

PO Box 5486
Johannesburg
2000

In order to facilitate the management of a decommissioning mine and an operational mine, Sasol Mining wants to separate the current approved 2011 integrated Environmental Management Programme (EMPr) into two separate management programmes.

Sasol Mining (Pty) Ltd Shandoni Colliery are proposing to expand existing mining operations in to the Block 8 North Reserve Area, located on on various mine in Govan Mbeki Local Municipality of Mpumalanga Province.

A Final Scoping Report (dBAR) by JMA Consulting (Pty) Ltd has been submitted in terms of the National Environmental Management Act, 1998 (NEMA) and the 2014 EIA Regulations for activities that trigger the Mineral and Petroleum Resources Development Act, 2002 (MPRDA)(As amended).

In order to meet the requirements of SAHRA for commenting in terms of section 38(8) of the National Heritage Resources Act, no. 25 of 1999 (NHRA), a Heritage Impact Assessment (HIA) by has been submitted to SAHRA for commenting.

Pistorius, J.C.C. July 2020. A Phase I Heritage Impact Assessment Study for the Shandoni and Middelbult Mining Areas near Secunda in the Mpumalanga Province.

The author undertook a field assessment of the proposed Northern Reserve section of the Shandoni Mine and identified 2 farmstead complexes with out buidings, 1 homestead and 8 burial grounds and graves. The overall impacts to these heritage resources is low due to the mine being an underground mine.

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The SAHRA Archaeology, Palaeontology and Meteorites (APM) Unit cannot provide comments on this development as not all heritage was assessed. The draft EIAR contains a map that clearly indicates that all

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proposed activities are located in a very high sensitive palaeontological zone and yet a PIA did not form part of the specialist studies. The conveyor belt footings, the road grading and the expansion of the discard dump will have an impact on palaeontological resources which that impact has not been investigated. A PIA must be undertaken by a suitably qualified palaeontologist as part of this EA application.

Furthermore, the HIA does not explain which sections were not surveyed for the current activities. A map of the proposed mine expansion zones and any surface infrastructure, overlain by the identified heritage resources must be included in the HIA report.

SAHRA will comment further once the HIA report is amended and a PIA report is submitted to the case for comment prior to the submission of the Final EIAr to the competent authority.

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

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ADMIN:

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(DMR, Ref: MP 30/5/1/2/3/2/1/138 MR)