



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: 15878

Date: Tuesday March 30, 2021

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Interim Comment

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

Attention: Ms Thingahangwi Tracy Tshivhase
South African Heritage Resources Agency

the proposed projects is for a 5Ha mining permit.

Ndlenhle Mining and Consultants (Pty) Ltd was appointed by the Greater Emalahleni Community Forum to undertake an environmental assessment for the proposed coal mine on the farm Kleinzuikerboschplaat 5 IS, in the eMalahleni Local Municipality of Mpumangal Province. The mine will be 5 hectares extent including the access/haul road, mobile office, ablution facilities as well as a mobile washing and screening plant.

An EMPr report has been submitted as well as a letter to SAHRA requesting comments due to discovering graves located on a portion of the proposed mining right area. In addition to the letter and EMPr, a Heritage Impact Assessment (HIA) has been submitted to the case.

The HIA report submitted to the case is for a development application in the Northern Cape, and not the proposed coal mine in Mpumalanga Province.

SAHRA issued an Interim Comment dated 22/01/2021, requesting an HIA report for the specific project under application, and the corresponding environmental documents.

Pelser, A. May 2018. A Report on a Phase 1 Heritage Impact Assessment for a Mining Right Application on Portion 1 of the Farm Kleinzuikerboschplaat 5IS Near Ogies, Situated in the Emalahleni Magisterial District in the Mpumalanga Province.

The author undertook a field assessment of proposed mining area and assessed the potential impacts to the previously identified burial grounds named OC4; OG4A & OG4B. A portion of the burial grounds is located within the proposed mining activieis. The author recommends that the proposed mining area is amended to exclude the cemetery. If the mine cannot do this then the graves in the mining area must be relocated. Prior to relocation, an archaeologist must be present during vegetation clearance so all individual graves can be identified.

A heritage management plan for the long term management of the graves *in situ* has been submitted to the



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case.

Mlilo, T. August 2020. Heritage Management Plan For Graves Located On The Edge Of The Mining Right Application Site Located On Portion Of Portion 1 Of The Farm Kleinzuckerboschplaat 5 Is In The Magisterial District Of Witbank, Mpumalanga Province.

The author was appointed to reassess the identified graveyard and compile a management plans as the applicant will not be relocating the graves. The mining area has been reduced from 5 ha to 3.5 ha to accommodate the retention of the cemetery *in situ*. The total area of the cemetery is 3.5 ha and the mine intends to undertake the following in order to preserve the site.

A social consultation period must be undertaken to identify the decedents of the people buried in the cemetery. They will be the custodians of the individual graves and permission from them must be obtained to fence the site.

The site must be fenced with an access gate that will be locked. Access procedures from the families must be developed.

A maintenance plan must be developed and appended to this management plan.

Interim Comment

The South African Heritage Resources Agency (SAHRA) Archaeology, Palaeontology and Meteorites (APM) Unit notes the submission of an HIA and Heritage Management Plan however, comments cannot be provided because an assessments of impacts on palaeontological resources was not undertaken.

SAHRA will provide further comments once a suitably qualified palaeontologist is appointed to undertake a Palaeontological Impact Assessment (PIA) to assess potential impacts to palaeontological resources as the proposed mine is located in a Very High Palaeontologically Sensitive area as according to the SAHRIS palaeomap policy. The mine will be impacting potentially fossiliferous rock strata above, and in between the coal seams.

A PIA report must be submitted to the case for comments prior to the submission of this BAR to the competent authority for decision making.

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

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

ADMIN:

Direct URL to case: <https://sahris.sahra.org.za/node/547940>
(DMR, Ref: mining permit)