



an agency of the
Department of Arts and Culture

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CaseID: 16231

Date: Monday January 31, 2022
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Final Comment

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

Attention: Nhlabathi Minerals (Pty) Ltd

Consol House, Osborn Road, Wadeville, Johannesburg, South Africa

Nhlabathi Minerals (Pty) Ltd are proposing to establish a new silica gravel mine named the Rietkol Mine Development on an area covering 221 ha consisting of: 16 Modder East Agricultural Holdings (AHs) on the farm Olifantsfontein 196 IR, each approximately 4.1 ha in extent; Portion 71 of the farm Rietkol 237 IR; and a portion of Remaining Extent (RE) of portion 31 of the farm Rietkol 237 IR. The Rietkol Mine Development is located in Wards 8 and 9 of the Victor Khanye Local Municipality within the Nkangala District Municipality of Mpumalanga Province. The MRA was accepted by the DMRE on 21 January 2021 and Nhlabathi has re-initiated the EIA process with Jacana Environmentals cc (Jacana) appointed as the independent Environmental Assessment Practitioner (EAP). Silica is planned to be mined by means of conventional opencast methods to a depth of between 30 and 50 meters below surface (mbs). The estimated life of mine (LOM) for the proposed Rietkol Project is 20 years. Further exploration drilling will be conducted during the operational phase, which may increase the LOM and mining depth if the resource proves viable. The proposed project includes the following mining and related infrastructure: • Opencast pits; • Processing plant (crushing, screening, washing and drying operations, etc.); • Product stockpiles; • Administration office facilities (security building, administration and staff offices, reception area, ablution facilities, etc.); • Production facilities (locker rooms, laboratory, workshops, stores, ablution facilities, etc.); • Access roads; and • Clean and dirty water management infrastructure. The main reason for this MRA is for the supply of silica sand to various markets including the glass, foundry and filtration industries in the Gauteng and Mpumalanga regions. In addition to this, many other local industries rely on various grades of silica sand to manufacture their products. The main products that are envisaged to be sold are River Sand, Amber Sand, Flint Sand, Chemical Sand and Filter Sand.

Nhlabathi Minerals (Pty) Ltd have appointed Jacana Environmental cc to undertake a Scoping and Environmental Impact Assessment application process in support for an Environmental Authorisation (EA) in terms of the National Environmental Management Act, Act no 107 of 1998 (NEMA) as amended, for activities that trigger the NEMA Environmental Impact Assessment (EIA) 2014 Regulations, as amended.

They wish to mine silica on Portions 31 and 71 of the farm Rietkol 237 IR and Olifantsfontein 196 IR in the



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Victor Kanye Local Municipality of the Mpumalanga Province. The proposed Rietkol Mine Right Area will be 221 ha in extent the proposed mining activities will consist of the following: Opencast pits; Run of mine (RoM) stockpiles; Processing plant (crushing, screening, washing and drying operations); Product stockpiles; Administration office facilities (security building, administration and staff offices, reception area, ablution facilities); Production facilities (locker rooms, laboratory, workshops, stores, ablution facilities); Bagging facility and warehouse; Weighbridge; Access roads; and Clean and dirty water management infrastructure.

A Heritage Impact Assessment (HIA) report by R&R Cultural Resources Consultants cc and Palaeontological Desktop Assessment report has been submitted to SAHRA for commenting in terms of section 38 of the National Heritage Resources Act, no. 25 of 1999 (NHRA).

Roodt, F. March 2021. Phase 1 Heritage Impact Assessment Report Proposed Rietkol Mining Operations Victor Khanye Local Municipality Nkangala District Mpumalanga.

The author undertook a field assessment of the proposed development area and identified 6 old dilapidated building remains and an unknown cemetery. Sites 1 and 6 are the remains of two homesteads, the author lists them as having local low significance. Sites 2 to 5 are the remains of a farmstead and its associated outbuildings. The burial grounds is of high significance and is located outside the proposed mining pit area. There may be impacts to the cemetery due to its proximity to the mining area. The author recommends no further mitigation measures for sites 1 to 6 as they all younger than 60 years. A 100m buffer around the cemetery must be maintained at all times.

Groenewald, G. September 2018. Desktop Palaeontological Assessment Survey for the proposed Rietkol Mining Operation (Rietkol Project) - Nhlabathi Minerals (Pty) Ltd in the Victor Khanye Local Municipality, Nkangala District Municipality, Mpumalanga Province.

The underlying geology of the mine right area consists of deep clays and sand from weathered dolomitic rocks of very old Pre-Karoo Hospital Hill Formation of the Witwatersrand Supergroup and Malmani Subgroup (Chuniespoort Group, Transvaal Supergroup) and deeply weathered Permian aged rocks of the Vryheid Formation, Ecca Group, Karoo Supergroup. The Vryheid formation and the Malmani Subgroup are of Very High palaeontological significance and the Hospital Hill Formation is of low palaeontological significance. The author recommends the following:

A monitoring plan must be developed and provision in the budget must be made for a palaeontologist to



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undertake monitoring of areas underlain by the Malmani Subgroup and Vryheid Formation. If any palaeontological material is exposed during digging, excavating, drilling or blasting, SAHRA must be notified. All development activities must be stopped, a 30 m no-go barrier constructed and a palaeontologist should be called in to determine proper mitigation measures.

Final Comment

The South African Heritage Resources Agency (SAHRA) Archaeology, Palaeontology and Meteorites (APM) Unit accepts the HIA and the Palaeontological Desktop Assessment reports submitted to the case for commenting, and has no objection to the development going ahead on the following conditions:

A Chance Finds Fossil Procedures must be developed by a palaeontologist and it must be included in the EMPr.

A monitoring plan must be developed and provision in the budget must be made for a palaeontologist to undertake monitoring of areas underlain by the Malmani Subgroup and Vryheid Formation.

The ECO, mine manager and mine workers must obtain training in identifying fossils that may occur in the mine right area.

In the event that fossils are uncovered during construction then construction must cease within the immediate vicinity, a buffer of 30 m must be established, and a palaeontologist called in to inspect the finds. The palaeontologist must obtain a section 35(4) permit in terms of NHRA and Chapter IV NHRA Regulations, before any fossils are collected.

If there are any new heritages resources are discovered during construction and operation phases of the proposed development, then a professional archaeologist or palaeontologist, depending on the nature of the finds, must be contracted as soon as possible to inspect the findings at the expense of the developer.

If the newly discovered heritage resources prove to be of archaeological or palaeontological significance, a Phase 2 rescue operation may be required at the expense of the developer. Mitigation will only be carried out after the archaeologist or palaeontologist obtains a permit in terms of section 35 of the NHRA (Act 25 of 1999). You may contact SAHRA APM Unit for further details: (Nokukhanya Khumalo/Phillip Hine 021 202 8654).

The Burial Grounds and Graves (BGG) Unit accepts the recommendations provided in the HIA report. A social consultation process in terms of Chapter XI of the NHRA Regulations, must be carried out to identify the



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descendants of the burials in the cemetery identified in the HIA, and obtain permission to fence the cemetery. If the families of the deceased agree to the fencing then a section 36 of the NHRA permit application must be logged on SAHRIS. As the mine is planning to mine the area in year 15, a secondary social consultation for the relocation of the burials will have to be undertaken 2 years before mining commences in the area as mentioned in the EMP. The graves will have to be relocated to a local municipal cemetery, with the permission of the relative and a section 36 of the NHRA permit application must be logged on SAHRIS.

If any unmarked human burials are uncovered and the archaeologist called in to inspect the finds and/or the police find them to be heritage graves, then mitigation may be necessary and the SAHRA Burial Grounds and Graves (BGG) Unit must be contacted for processes to follow (Thingahangwi Tshivhase/Mimi Seetelo 072 802 1251).

The Final EIA and its appendices must be submitted to the case and once a Record of Decision from the competent authority is issued, it must also be submitted to the case.

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



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

ADMIN:

Direct URL to case: <https://sahris.sahra.org.za/node/564573>
(DMR-MP, Ref: MP 30/5/1/2/2/10268 MR)

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.