



an agency of the  
Department of Arts and Culture

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CaseID: 16603

Date: Friday November 26, 2021

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## Final Comment

**In terms of Section 38(8), 38(4) of the National Heritage Resources Act (Act 25 of 1999)**

Attention: North Block Complex (Pty) Ltd

### **Phase 1 HIA for the North Block Complex Consolidation Project and Discard Management Facility, located near eMakhazeni in the Mpumalanga Province.**

North Block Complex (Pty) Ltd of NBC Colliery is proposing to amend its existing mine right licence by consolidating their Glisa mine section mine right area into the Paardeplaats mine section. They also proposing to include Portion 24 of the farm Paardeplaats 380 JT into the Paardeplaats mine right. As part of the EMPR amendment application, the colliery is proposing to widen the existing haul road between the mining area and the processing plant. The mine is proposing to expand the existing crushing and screening plant on Portions 3 and 4 of the Paardeplaats farm, and to expand the existing Water Treatment Plant (WTP) pipeline network on all farm portions associated with the Integrated Paardeplaats Section.

CGI Environmental (Pty) Ltd have been appointed to undertake an environmental assessment as part of the Scoping and Environmental Impact Reporting process in support of an Environmental Authorisation (EA) in terms of the National Environment Management Act, Act 107 of 1998 (NEMA) for activities that trigger the NEMA EIA 2014 Regulations. As well as an Environmental Management Plan as per the requirements of the Minerals and Petroleum Resources Development Act, No 28 of 2002 (MPRDA)(As amended).

SAHRIS Case ID 5699 is linked to this case

(<https://sahris.sahra.org.za/cases/proposed-paardeplaats-coal-mine>).

A Heritage Impact Assessment report by PGS Heritage (Pty) Ltd has been submitted to SAHRA for commenting in terms of section 38 of the National Heritage Resources Act, no. 25 of 1999 (NHRA).

*Birkholtz, P. and de Bruyn, C. May 2021. NBC Colliery Glisa and Paardeplaats Mining Project. Phase 1 – Heritage Impact Assessment*

PGS Heritage had conducted a field survey in 2012 for the Paardeplaats mine application and identified 32 heritage resources, labeled PP1 to 32 in this report. In 2021 an additional survey of the existing sites and areas not surveyed previously identified an additional 13 heritage sites labeled PP 33 to 45. Most of the



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identified sites relate to historic farming infrastructure, historic mine shafts and cemeteries. There is one possible rock art site (PP 14) that is of medium significance. The proposed infrastructure development will not impact on any heritage resources however, the authors recommend the following:

Sites PP 01, PP 07, PP 08, PP 09, PP 18, PP 19, PP 20, PP 23, PP 24, PP 34, PP 35, PP 38, PP 39, PP 41, PP 42, PP 43, PP 44 & PP 45; are of low significance and do not require any additional mitigation measures.

Sites PP 12, PP 13, PP 14, PP 17, PP 36 require a heritage management plan for long term conservation. They require general mitigation measures detailed in section 8.3 of the HIA report.

All identified burial grounds (PP 2, PP 3, PP 4, PP 5, PP 10, PP 16, PP 28, PP 31 and PP 37) must be conserved *in situ*.

The mine must maintain a buffer zone of 100m from any identified burial or cemetery, the mine must also maintain a buffer zone of 50m around any other historic structure and archaeological site that is of medium to high significance.

Butler, E. (2021) was appointed to undertake a Palaeontological Desktop Study which assessed that the mining area is completely underlain by the Vryheid Formation, which is of Very High Palaeontological significance. The author recommended a Palaeontological Impact Assessment to be undertaken in the Environmental Impact Assessment phase

The SAHRA issued an Interim Comment dated 06/09/2021, requesting an assessment of palaeontological resources to be submitted. The PIA report by Banzai Environmental (Pty) Ltd was submitted on 18/09/2021.

*Butler, E. September 2021. Palaeontological Impact Assessment for the NBC Colliery, Glisa and Paardeplaats Mining Projects near Emakhazeni (Belfast) in Mpumalanga.*

The proposed mining area is underlain by Permian aged shale, sandstone and coal of the Vryheid Formation, Ecca Group, Karoo Supergroup, of *Very High* palaeontological significance. There is also two isolated Quaternary Alluvium of low palaeontological significance are present. The author did not observe any outcrops of the Vryheid Formation during the site visit. The author recommends the following:

The Fossil Chance Finds Procedure attached under section 12 is implemented. If any palaeontological

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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 SAHRA Archaeology, Palaeontology and Meteorites (APM) accepts the HIA and PIA reports and recommendations contained therein. The SAHRA has no objection to the development going ahead on the following conditions:

A Heritage Management Plan must be completed by a suitably qualified archaeologist for the long term conservation of sites PP 2, PP 3, PP 4, PP 5, PP 10, PP14, PP 16, PP 28, PP 31 and PP 37.

SAHRA requires a rock art specialist to be commissioned to inspect the site, determine its significance and record the site by high resolution photography so that all monitoring uses the initial recording as a baseline. This significance assessment report must be submitted to SAHRA for commenting before construction begins.

Consultation and/or a permit application will have to be logged at the Mpumalanga Heritage Resources Authority (MPHRA) for the destruction or alteration of buildings older than 60 years.

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

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consultation process in terms of Chapter XI of the NHRA Regulations, must be carried out to identify the descendants of the burials at sites PP 2, PP 3, PP 4, PP 5, PP 10, PP 16, PP 28, PP 31 and PP 37. If the family agrees to the fencing of site, then a section 36 NHRA permit application must be logged on SAHRIS for the fencing of the grave site. If the site cannot be conserved in situ then permission for relocation must be sought from the families and a section 36 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 Tshivase/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

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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

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**ADMIN:**

Direct URL to case: <https://sahris.sahra.org.za/node/575406>  
(DMR-MP, Ref: MP 30/5/1/2/2/10090 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.