

Our Ref:



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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Enquiries: Natasha Higgitt
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CaseID: 18444

Date: Friday May 20, 2022
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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: Mr Chirigo, Phumelelo Ritchie
Ritchie Rich Enterprises (Pty) Ltd

Coal mining permit application on portion of portion 13 of the Farm St Helena 67 HT by Ritchie Rich Enterprises (Pty) Ltd situated in the Magisterial District of Mkhondo (Wakkerstroom) in Mpumalanga Province.

Singo Consulting (Pty) Ltd has been appointed by Ritchie Rich Enterprises (Pty) Ltd to undertake an Environmental Authorisation (EA) Application for proposed mining activities on portion of portion 13 of the Farm St Helena 67 HT, near Dirkiesdorp, Mpumalanga (MP 30/5/1/3/2/13206 MP).

A Draft Basic Assessment Report (DBAR) has been submitted in terms of the National Environmental Management Act, 1998 (NEMA) and the EIA Regulations for activities that trigger the Mineral and Petroleum Resources Development Act, 2002 (MPRDA)(As amended). The proposed coal mining activities will cover an area of 5 ha and will include activities such as site clearance, removal of topsoil, overburden and stockpiling, excavation of boxcut, blasting, haul road, waste dump, crushing and screening of ore, ablution facilities and rehabilitation.

Integrated Specialist Services (Pty) Ltd has been appointed to provide heritage specialist input as part of the EA application process as required by section 24(4)b(iii) of NEMA and section 38(8) of the National Heritage Resources Act, Act 25 of 1999 (NHRA) that complies with section 38(3) of the NHRA.

Mlilo, T and Kumbani, J. 2022. Phase 1 Archaeological and Heritage Impact Assessment Report for the Proposed Coal Mining Permit Application for Ritchie Rich Enterprises (Pty) Ltd in respect of Portion of Portion 13 of the Farm St Helena 67 HT, situated in the Magisterial District of Mkhondo (Wakkerstroom) in Mpumalanga Province.

No heritage resources were identified within the proposed development area. A burial ground was identified 400 m from the proposed mining application

Recommendations provided in the report include the following:

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- The identified burial site must be preserved in situ and properly mapped before any mining activity commences;
- The planners for the proposed mine must provide for a 100m buffer zone for the recorded burial site;
- No heritage mitigation work is allowed without the consent of descendant families;
- The mining permit application may be approved to proceed as planned under observation that project work does not extend beyond the surveyed site;
- It is advised that the SAHRA/ MPHRA is alerted when work on site begins;
- Strict and clear reporting procedures for chance findings must be followed by and its contractors throughout the mining phase;
- Although the burial site was recorded outside the mining permit application site, it is the responsibility of the applicant to protect the graves during the operational phase of the mine;
- The proposed mining development must provide at least 100m buffer zone from the recorded burial site;
- The burial site must be mapped and clearly marked to avoid any accidental damage to the graves;
- A Management Plan must be compiled for the burial site;
- A Chance Finds Procedure must be implemented.

Interim Comment

The SAHRA Archaeology, Palaeontology and Meteorites (APM) Unit requests that a field-based Palaeontological Impact Assessment be conducted for the proposed mining application as the development footprint is located in an area of very high sensitivity for palaeontological resources as per the SAHRIS PalaeoSensitivity Map. The report must be undertaken by a qualified palaeontologist. (See <https://www.palaeosa.org/heritage-practitioners.html> for a list of qualified palaeontologists). The report must comply with the 2012 Minimum Standards: Palaeontological Components of Heritage Impact Assessments.

The applicant is advised to extend the EA process in terms of section 19(1)b of the NEMA EIA Regulations in order to comply with this comment. A revised BAR with the results of the above requested specialist study must be completed.

Should you have any further queries, please contact the designated official using the case number quoted above in the case header.

Yours faithfully

Coal mining permit application on portion of portion 13 of the Farm St Helena 67 HT.

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Natasha Higgitt
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/596168>
(DMR-MP, Ref: DMRE REF: MP 30/5/1/3/2/13206 MP)