

**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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[www.sahra.org.za](http://www.sahra.org.za)

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CaseID: 18879

Date: Thursday July 14, 2022  
Page No: 1

## **Interim Comment**

**In terms of Section 38(3), 38(8) of the National Heritage Resources Act (Act 25 of 1999)**

Attention: 2 Seam (Pty) Ltd.

**The 2 Seam Mine is an existing opencast coal mine. 2 Seam (Pty) Ltd. is in the process of applying, in terms of the Mineral and Petroleum Resources Development Act 2002 (MPRDA) (Act No. 28 of 2002), and the Environmental Impact Assessment Regulations (Listing Notice 1, 2 and 3, 2014 published in Government Notice (GN) No. 983, 984 and 985 of 4 December 2014 and amended in June 2021) under the National Environmental Management Act (Act No. 107 of 1998), and the National Environmental Waste Management Act (Act 56 of 2008) for an Environmental Authorisation and Waste Management Licence, to include a washing plant, tailings facility, associated stormwater management infrastructure, a contractor's yard and an opencast coal pit within the approved mining right boundary over portions 6, 29, 31, and 50 of the Farm Vlakraagte 45 IS and portion RE of the Farm Lourens 472 IS. A Section 102 application in terms of the MPRDA (2002, as amended), will be submitted to the Department of Mineral Resources and Energy (DMRE) for the amendments to the Environmental Management Programme.**

Elemental Sustainability has been appointed by 2 Seam (Pty) Ltd to undertake an Environmental Authorisation Application for proposed mining related activities within an existing open-cast coal mine on portions 6, 29, 31, and 50 of the Farm Vlakraagte 45 IS and portion RE of the Farm Lourens 472 IS, near Kriel, Mpumalanga Province (MP 30/5/1/2/3/2/1 (405)).

A Draft Scoping Report (DSR) 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 activities include additional access/haul roads, wash plant, additional opencast mining, stormwater management facilities, pipelines, powerlines, tailings facility, pollution control dams, contractors yard and a river diversion. The life of mine will be extended by five years.

It is noted that an existing Heritage Impact Assessment will be updated for the proposed project which will include a palaeontological component.

**Interim Comment**

## 2 Seam Mine: Coal Wash Plant, River Diversion, Tailings Facility, Pollution Control Dams and River Diversion

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The SAHRA Archaeology, Palaeontology and Meteorites (APM) Unit requests that the pending assessment of the impact to heritage resources comply with section 38(3) of the NHRA as required by section 38(8) of the NHRA. The HIA must include an archaeological and palaeontological component.

The archaeological component of the HIA must be conducted by a qualified archaeologist and must comply with the SAHRA 2007 Minimum Standards: Archaeological and Palaeontological Components of Impact Assessment Reports (see [www.asapa.co.za](http://www.asapa.co.za) or [www.aphp.org.za](http://www.aphp.org.za) for a list of qualified archaeologists).

The proposed development is located within an area of moderate and very high Palaeontological Sensitivity as per the SAHRIS PalaeoSensitivity map. As such, a field-based Palaeontological Impact Assessment (PIA) 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.

Any other heritage resources as defined in section 3 of the NHRA that may be impacted, such as built structures over 60 years old, sites of cultural significance associated with oral histories, burial grounds and graves, graves of victims of conflict, and cultural landscapes or viewsapes must also be assessed.

Further comments will be issued upon receipt of the above requested reports and draft EIA inclusive of appendices.

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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Natasha Higgitt  
Heritage Officer  
South African Heritage Resources Agency

## 2 Seam Mine: Coal Wash Plant, River Diversion, Tailings Facility, Pollution Control Dams and River Diversion

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

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**ADMIN:**  
Direct URL to case: <https://sahris.sahra.org.za/node/599738>  
(DMR, Ref: MP) 30/5/1/2/3/2/1 (405) EM