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CaseID: 19308

Date: Friday September 09, 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: Mrs Tebogo Chauke  
Glencore Operations South Africa (Pty) Ltd

**Amendment for mine and layout optimisation: 1) Introduce limited additional mining areas (underground) that have now become economically viable 2) Change the mining methodology in certain areas, from opencast to underground 3) Include some limited additional infrastructure requirements for the underground mining 4) Slightly revise the re-alignment of P53-1 on portions of Goedgevonden 10 IS, Zaaiwater 11 IS, Grootpan 7 IS and Kleinzuikerboschplaat 5 IS in Nkangala District, Mpumalanga.**

Jacana Environmentals CC has been appointed by Glencore Operations South Africa (Pty) Ltd to conduct an Environmental Authorisation (EA) Amendment Application for proposed amendments to the approved Goedgevonden Colliery, near Ogies, Mpumalanga Province (MP 30/5/1/2/2/169 MR).

A draft Amendment Report has been submitted in terms of the National Environmental Management Act, 1998 (NEMA) and the 2014 EIA Regulations for activities that trigger the Mineral and Petroleum Resources Development Act, 2002 (MPRDA)(As amended). The proposed amendments include limited additional underground mining areas, limited additional infrastructure requirements for the underground mining and re-alignment of the P53-1 road.

APelser Archaeological Consulting has been appointed to provide heritage specialist input into the EA 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).

*Pelser, A. 2022. HIA Report for the New Incline Shafts & P53-1 Road Alignment Development Goedgevonden Colliery, near Ogies, Mpumalanga.*

Two heritage resources were identified as part of the HIA. This includes a burial ground near proposed Incline Shaft 3 (Site MHC031), which was not visited by the heritage specialist and therefore the state of the site is unknown, and a burial ground (GY16) in close proximity to the new road realignment. The ruined structure identified at Shaft 2 is not a heritage resource and will not be discussed.

**Our Ref:**



an agency of the  
Department of Arts and Culture

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Recommendations provided in the report include the following:

- Site MHC031 to be left in-situ and not disturbed by future mining operations;
- Care should be taken that there is no accidental damage to or negative impacts to the site and graves at Site GY16;
- A Chance Finds Procedure is recommended.

The Amendment report references a Cultural Heritage Management Plan (CHMP), however, this has not been submitted on the application.

### **Interim Comment**

The SAHRA Archaeology, Palaeontology and Meteorites (APM) Unit requests that a field-based Palaeontological Impact Assessment (PIA) be conducted as part of the EA process 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 comply with the 2012 Minimum Standards: Palaeontological Components of Heritage Impact Assessments.

Additionally, the HIA must be revised to address the following:

- The results of the Blasting report must be including in the impact assessment of the heritage resources;
- The impact of the new proposed underground mining areas and potential subsidence on heritage resources (including palaeontological resources) must be assessed;
- The location and status of site MHC031 must be verified;
- A full description of the site GY16 must be provided.

Finally, the CHMP must be submitted for review. The applicant is advised to extend the EA process in terms of section 32(1)b of the NEMA EIA Regulations in order to address this comment. Further comments will be issued upon receipt of the above requested reports.

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

Yours faithfully

# Goedgevonden Colliery EA Amendment: Underground inclines and Roads Realignment

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Natasha Higgitt  
Heritage Officer  
South African Heritage Resources Agency

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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/603213>  
(DMR-MP, Ref: MP 30/5/1/2/2/169 MR)