

Our Ref:



an agency of the  
Department of Arts and Culture

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CaseID: 19354

Date: Wednesday December 14, 2022  
Page No: 1

## Final Comment

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

Attention: Italo Clothings (Pty) Ltd

### **Environmental Authorization for the proposed Mining Permit Application within portion of portion 32 of the Farm Blesboklaagte 296 JS , under the Magisterial District of Nkangala, Mpumalanga Province.**

Singo Consulting (Pty) Ltd has been appointed by Italo Clothings (Pty) Ltd to undertake an Environmental Authorisation Application for proposed mining activities on portion of portion 32 of the Farm Blesboklaagte 296 JS, near Ackerville, Mpumalanga Province (MP 30/5/1/1/3/13294 MP).

In an Interim Comment issued on the 06/10/2022, SAHRA requested that an assessment of the impact to heritage resources be undertaken as per 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.

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 mining activities will include open cast mining and blasting, vegetation clearance, various stockpiles, access road, waste rock dump, dirty water trench, mobile offices, toilets and sanitation, pollution control dam within an application area of 5 ha.

The DBAR states that no heritage resources were identified as part of the ground truthing visit, however, there is no indication that a qualified heritage practitioner conducted the site assessment, as per section 38(2) of the National Heritage Resources Act, Act 25 of 1999 (NHRA). No assessment of the impact to heritage resources has been conducted as per section 24(4)b(iii) of NEMA and section 38(8) of the NHRA that complies with section 38(3) of the NHRA.

### **Final Comment**

The SAHRA Archaeology, Palaeontology and Meteorites (APM) Unit cannot endorse this proposed development and advises the Department of Mineral Resources and Energy (DMRE) to reject the application for Mining Permit activities on portion of portion 32 of the Farm Blesboklaagte 296 JS, near Ackerville, Mpumalanga Province (MP 30/5/1/1/3/13294 MP) as the impact to heritage resources as required by section

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24(4)b(iii) of NEMA and section 38(3) and 38(8) of the NHRA has not been conducted as part of the EA process.

This comment must be forwarded directly to the competent authorities and proof of the submission and receipt thereof must be provided to SAHRA.

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

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

**ADMIN:**

Direct URL to case: <https://sahris.sahra.org.za/node/603934>  
(DMR-MP, Ref: MP 30/5/1/1/3/13294 MP)