



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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CaseID: 19402

Date: Wednesday September 21, 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: Sasol Mining (Pty) Ltd

PO Box 5486
Johannesburg
2000

Sasol Mining (Pty) Ltd (hereafter referred to as Sasol Mining) operates several underground coal mines near Secunda, Mpumalanga Province. To ensure an uninterrupted coal supply to the Sasol Operations (SO) in Secunda, Sasol Mining has acquired new reserves and in future will deploy its mining activities into these new areas. These areas are the Alexander Block 2, 3 and 4, herein referred as the “Alexander Mining Project”.

Jones & Wagener (Pty) Ltd has been appointed by Sasol Mining (Pty) Ltd to conduct an Environmental Authorisation Application for proposed mining activities near Bethal, Mpumalanga Province.

A draft Scoping Report (DSR) 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 mining right application area will cover 10 700 ha and will include open cast mining and a mine complex consisting of offices, parking, change house, workshops, substation, haul roads, Run of Mine, temporary coal stockpile, Pollution Control Dam, canals, contaminated and topsoil stockpiles, a sewage treatment plant; an overland conveyor, access roads, powerlines and potable and dirty water pipelines.

Dr Heidi Fourie and Digby Wells Environmental were appointed to provide heritage specialist input into the EA process as per section 24(4)b(iii) of NEMA and section 38(8) of the National Heritage Resources Act, Act 25 of 1999 (NHRA).

Fourie, H. 2022. Sasol South Africa (Pty) Ltd. Alexander Mining Project. Palaeontological Impact Assessment: Phase 1 Field Study

The proposed development area is underlain by the Vryheid Formation that may contain plant fossils such as Glossopteris flora. A fossil bivalve imprint was identified outside of the proposed development area. A Chance



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Finds Procedure is recommended to be followed.

Nel, J. 2022. Heritage Baseline and Heritage Impact Assessment: Sasol Mining (Pty) Ltd Alexander Mining Project.

A total of 66 heritage resources were identified within the proposed development footprint, while 41 of these resources may be impacted by the proposed mining activities. These include one geological feature (a white sandstone ridge) from which the farm derives its name, one palaeontological resource (the fossil bivalve imprint discussed above), 17 archaeological resources, 21 burial grounds and graves and 26 built environment resources.

Recommendations provided in the report include , but are not limited to, the following:

- A Watching Brief and Chance Finds Protocols must be integrated into the EMP;
- The werf must be documented in detail by the responsible officer or specialist;
- A minimum buffer of 50 m must be maintained from the perimeter of the built environment sites and archaeological sites;
- Burial grounds must be documented in detail by the responsible officer or specialist;
- The design and operation of the access road and the ventilation shafts must maintain minimum buffers as follows: 100 m buffer within the mining boundary; and 30 m buffer within any linear or other infrastructure;
- Periodic monitoring of burial grounds and built environment sites must take place for the duration of the construction period, especially before and after blasting events;
- A Stakeholder Engagement Plan (SEP) must be compiled and integrated into the EMP or other relevant reports to make provision to communicate any damage, restrictions or possible relocation of graves to interested parties;
- All identified heritage resources must be monitored periodically throughout the operational lifespan of the Alexander Project, including rehabilitation;
- All burial grounds and graves within the Alexander Project area must be demarcated and categorised as 'no-development areas'. In addition, the same monitoring requirements outlined above apply. In the event that access to any burial ground is restricted, this must be communicated to landowners and occupiers, local community members and the SAHRA BGG. In the event that buffers cannot feasibly be maintained permit applications for the relocation of burial grounds and graves or destruction of archaeological and built environment resources must be made.

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The SAHRA Archaeology, Palaeontology and Meteorites (APM) Unit notes the submitted heritage reports and is satisfied with the content of the reports. SAHRA awaits the draft EIA inclusive of appendices to be submitted before further comments can be issued.

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

Yours faithfully

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://sahrissahra.org.za/node/604239>
(DMR, Ref:)