

Our Ref: 19490



an agency of the  
Department of Arts and Culture

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CaseID: 19490

Date: Thursday October 06, 2022

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## Interim Comment

### In terms of Section 38(8) of the National Heritage Resources Act (Act 25 of 1999)

Attention: 22-1768 AUTH Fraxocare 13329MP DBAR

**Fraxocare (Pty) Ltd (hereinafter Fraxocare) is applying for a new Mining Permit (MP) adjacent to the existing Highveld Collieries opencast mining operations. Fraxocare intends on using the existing infrastructure at Highveld Collieries in order to optimise the MP area for resource extraction. The MP area is located on a portion of Portion 46 of the Farm Elandsfontein 309 in the Mpumalanga Province of South Africa. The resource will be mined via opencast roll over mining.**

Fraxocare (Pty) Ltd has appointed Eco Elementum (Pty) Ltd to undertake a Basic Assessment (BA) application process in support of an Environmental Authorisation application in terms of the National Environmental Management Act, 1998 (NEMA), as amended and a Mine Permit in terms of the Mineral and Petroleum Resources Development Act, 2002 (MPRDA) (As amended), for listed activities in the NEMA EIA Regulations 2014, as amended.

A Heritage Impact Assessment by has been submitted to SAHRA in terms of section 38(8) of the National Heritage Resources Act, 25 of 1999 for commenting.

*Coetzee, T. July 2022. PHASE 1 ARCHAEOLOGICAL IMPACT ASSESSMENT for the Proposed Fraxocare Mining Permit on a Portion of Portion 46 of the Farm Elandsfontein 309 JS, eMalahleni, Mpumalanga.*

The mine permit area has been historically cultivated making the likelihood of heritage resources will occur on the surface of the study area. A building named Site B01 in the report was mapped in the 1960 topographical map, however, later maps (1974) do not show this building. There maybe some heritage resources uncovered around this site. The author recommends chance finds procedures that must be included in the EMPr for implementation by the mine manager and environmental practitioner.

### Interim Comment

The SAHRA Archaeology, Palaeontology, and Meteorites (APM) Unit cannot provide comments on this development without the submission of the draft BAR to the case.

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In addition, SAHRA also requires an assessment of palaeontological resources by a suitably qualified palaeontologist. The study area is underlain by *Very High* sensitive region on the Palaeomap and according to the Palaeomap policy requires a field based palaeontological assessment of all applications that trigger section 38(8) of the NHRA.

The Palaeontology Impact Assessment (PIA) must be provided to SAHRA prior to the submission of the final BAR to the competent authority.

All these documents will be assessed by SAHRA and the comment issued must be included in the final BAR.

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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Nokukhanya Khumalo  
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/604717>  
(DMR-MP, Ref: MP 30/5/1/1/3/13329 MP)

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