

**Our Ref:**



an agency of the  
Department of Arts and Culture

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CaseID: 19800

Date: Friday January 27, 2023  
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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: Lazalelihlokohlo Mining and Projects (Pty) Ltd

**ENVIRONMENTAL IMPACT ASSESSMENT AND ENVIRONMENTAL MANAGEMENT PROGRAMME REPORT FOR COAL MINING RIGHT, INTEGRATED WATER USE LICENSE, WASTE MANAGEMENT LICENCE, AND ENVIRONMENTAL AUTHORISATION APPLICATIONS ON PORTIONS ( RE,1, 2, 3, 6, 10, 11, 13, 14, 15, 16, 18, 26, 27, 29, 30, 33) OF THE FARM MOOIHOK 168 HT, PORTIONS (RE,1, 2, 3, 4) OF THE FARM KLIPSPRUIT 136 HT AND PORTIONS (RE,1, 2, 3, 4) OF THE FARM KLIPSPRUIT 138 HT, LOCATED IN THE MAGISTERIAL DISTRICT OF PIET RETIEF , MPUMALANGA PROVINCE. DMRE REF: MP 30/5/1/2/2/10230 MR**

Singo Consulting (Pty) Ltd has been appointed by Lazalelihlokohlo Mining and Projects (Pty) Ltd to undertake an Environmental Authorisation Application for proposed mining activities on Portions ( Re,1, 2, 3, 6, 10, 11, 13, 14, 15, 16, 18, 26, 27, 29, 30, 33) of the Farm Mooihoek 168 HT, Portions (Re,1, 2, 3, 4) of the Farm Klipspruit 136 HT and Portions (Re,1, 2, 3, 4) of the Farm Klipspruit 138 HT, near Bethal, Mpumalanga Province (MP 30/5/1/2/2/10230 MR).

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 mining (30 years) will include open cast coal mining, topsoil stockpiles, blasting, overburden stockpiles, access and haul roads, crushing and screening facilities, weighbridge, offices with septic tank, workshop, stores, diesel facilities and a hardstand, powerline and water pipelines, surface water management measures within an application area of 2 736.340 ha.

The DSR states that an assessment of the impact to heritage resources will be undertaken as part of the EIA phase. In an Interim Comment issued on the 04/11/2022, SAHRA noted the pending heritage reports. Since the issuing of the Interim Comment, the requested heritage reports and draft EIA have been submitted for review (15/12/2022).

*Fourie, H. 2022. Palaeontological Impact Assessment for a mining right application on various portions of the farm Mooihoek 168-HT, Klipspruit 136-HT, Klipspruit 137-HT, Klipspruit 138-HT, located in the Magisterial District of Piet Retief, Mpumalanga Province*

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The proposed development area is underlain by the Vryheid Formation and Jurassic Dolerite. No fossils were identified as part of the site visit. A Chance Finds Procedure is recommended to be followed.

*Miilo, T. 2022. Heritage Impact Assessment for Coal Mining Right Application, Integrated Water Use License Application and Environmental Authorisation, on different portions of three Farms: Mooihoek 168 HT, Klipspruit 136 HT, Klipspruit 137 & Klipspruit 138 HT located in the Magisterial District of Piet Retief, Mpumalanga*

A total of two heritage resources were identified within the proposed development area. These include burial grounds of high heritage significance.

Recommendations provided in the report include the following:

- The planners of the mine layout plans must provide for 100m buffer zones from the recorded burial sites;
- Given the nature of the study area, a walk down survey must be done by a professional archaeologist once the layout plans for the mine are finalised. This is to ensure that significant heritage resources are identified within the mine footprint;
- The public participation process must request landowners and residents to declare graves located within their properties and residences since it was not practical to visit households during the survey;
- From a heritage perspective supported by the findings of this study, the Mining Right Application is supported. However, the Mining Right Application should be approved under observation that mining does not extend beyond the area considered in this report/affect the identified heritage sites;
- Should chance archaeological materials or human remains be exposed during mining on any section of the site, work should cease on the affected area and the discovery must be reported to the heritage authorities immediately so that an investigation and evaluation of the finds can be made. The overriding objective, where remedial action is warranted, is to minimize disruption in mining scheduling while recovering archaeological and any affected cultural heritage data as stipulated by the NHRA regulations.

### **Interim Comment**

The SAHRA Archaeology, Palaeontology and Meteorites (APM) Unit requests that the HIA be revised to include a full description of the identified burial sites, including GPS co-ordinates, descriptions of headstones and the sites overall.

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Further comments will be issued upon receipt of the above revised report.

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/606643>  
(DMR-MP, Ref: MP 30/5/1/2/2/10230 MR)