

Our Ref:



an agency of the
Department of Arts and Culture

T: +27 21 462 4502 | F: +27 21 462 4509 | E: info@sahra.org.za
South African Heritage Resources Agency | 111 Harrington Street | Cape Town
P.O. Box 4637 | Cape Town | 8001
www.sahra.org.za

Enquiries: Natasha Higgitt
Tel: 021 462 4502
Email: nhiggitt@sahra.org.za
CaseID: 20083

Date: Monday January 09, 2023
Page No: 1

Final Comment

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

Attention: Mandlaglo Commodities (Pty) Ltd

PROPOSED SECTION 102 AMENDMENT OF THE CURRENT ENVIRONMENTAL AUTHORISATIONS IN RESPECT TO PORTION 1 OF THE FARM KAFFERSTAD 195 IS, STEVE TSHWETE LOCAL MUNICIPALITY, MPUMALANGA PROVINCE

Eco Elementum has been appointed by Mandlaglo Commodities (Pty) Ltd to conduct an Environmental Authorisation (EA) Amendment Application for proposed amendments to the approved Tala Bethal Coal Mine on Portion 1 of the Farm Kafferstad 195 IS, near Hendrina, Mpumalanga Province (MP-00165-MR/102).

A draft Basic Assessment 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 a new open cast section and new Wash Plant with pipelines.

Heidi Fourie and Agri Civils: Geo-Tech & Heritage 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).

Fourie, H. 2018. Palaeontological Impact Assessment: Phase 1 Field Study. Mining Rights for the Tala Bethal (Mandlaglo) Coal Mine

The proposed development is underlain by the potentially highly sensitive Vryheid Formation and Glossopteris flora fossils may be present within the coal seams. No fossils were identified as part of the site visit. A Fossil Chance Finds Protocol is recommended to be implemented.

Coetzee, T. 2022. Phase 1 Archaeological Impact Assessment for the Proposed Tala Bethal S102 Amendment on a Portion of Portion 1 of the Farm K-Stad 195 IS, Hendrina, Mpumalanga

One previously present historical structure within the proposed development area of low heritage significance was identified, having been demolished. No additional heritage resources were identified within the proposed



an agency of the
Department of Arts and Culture

T: +27 21 462 4502 | F: +27 21 462 4509 | E: info@sahra.org.za
South African Heritage Resources Agency | 111 Harrington Street | Cape Town
P.O. Box 4637 | Cape Town | 8001
www.sahra.org.za

Enquiries: Natasha Higgitt
Tel: 021 462 4502
Email: nhiggitt@sahra.org.za

Date: Monday January 09, 2023
Page No: 2

CaseID: 20083

amendment area. One demolished (B02) and one intact historical structure (B03) of low heritage significance and two burial ground of high heritage significance are located outside of the proposed development footprint. Site B03 is located 100 m from the proposed open cast area and may be impacted by blasting. Cemetery F01 will be impacted by a proposed berm.

Recommendations provided in the report include the following:

- It is therefore recommended that the Environmental Control Officer monitor the site (B03) on a quarterly basis, as well as pre and post blasting. Should damage to the site be observed, a qualified archaeologist must be contacted. Should impact to the site be unavoidable, a destruction permit may be applied for from the Mpumalanga Provincial Heritage Resources Authority;
- It is recommended that a 20 m fenced-off conservation buffer be erected around the cemetery in order to avoid accidental damage, and that no mining/construction activities take place within 100 m of the cemetery. Access to the cemetery should also not be refused. Should impact to the cemetery be unavoidable, a grave relocation process may be initiated;
- A Chance Finds Procedure is recommended to be followed.

Final Comment

The following comments are made as a requirement in terms of section 38(8) of the NHRA in the format provided in section 38(4) of the NHRA and must be included in the Final BAR and EMPR:

- 38(4)a – The SAHRA Archaeology, Palaeontology and Meteorites (APM) Unit and Burial Grounds and Graves (BGG) Unit has no objections to the proposed development;
- 38(4)b – The recommendations of the specialists are supported and must be adhered to. Further additional specific conditions are provided for the development as follows:
 - Monitoring of waste rock dumps by a qualified palaeontologist for any fossil heritage must be conducted every 3 months for the first 2 years of the additional underground mining activities. Monitoring reports must be submitted to SAHRA for review and comment;
 - Monitoring reports for site B03 must be submitted to SAHRA;
 - BGG Unit conditions: A Conservation Plan must be developed for long term preservation of the identified burial sites. The site must be cleared and monitored on a regular basis. Should relocation become necessary, consultation process as outlined in the NHRA Regulations must be observe as appropriate.
- 38(4)c(i) – If any evidence of archaeological sites or remains (e.g. remnants of stone-made structures,

**MANDLAGLO COMMODITIES (PTY) LTD TALA BETHAL COAL MINE
INTEGRATED ENVIRONMENTAL AUTHORISATIONS – BASIC ASSESSMENT
REPORT MP 30/5/1/2/2/10191 MR |MP-00165-MR/102**

Our Ref:



an agency of the
Department of Arts and Culture

T: +27 21 462 4502 | F: +27 21 462 4509 | E: info@sahra.org.za
South African Heritage Resources Agency | 111 Harrington Street | Cape Town
P.O. Box 4637 | Cape Town | 8001
www.sahra.org.za

Enquiries: Natasha Higgitt
Tel: 021 462 4502
Email: nhiggitt@sahra.org.za

Date: Monday January 09, 2023

Page No: 3

CaseID: 20083

indigenous ceramics, bones, stone artefacts, ostrich eggshell fragments, charcoal and ash concentrations), fossils or other categories of heritage resources are found during the proposed development, SAHRA APM Unit (Natasha Higgitt/Phillip Hine 021 462 5402) must be alerted as per section 35(3) of the NHRA. Non-compliance with section of the NHRA is an offense in terms of section 51(1)e of the NHRA and item 5 of the Schedule;

- 38(4)c(ii) – If unmarked human burials are uncovered, the SAHRA Burial Grounds and Graves (BGG) Unit (Thingahangwi Tshivhase/Nggabutho Madida 012 320 8490), must be alerted immediately as per section 36(6) of the NHRA. Non-compliance with section of the NHRA is an offense in terms of section 51(1)e of the NHRA and item 5 of the Schedule;
- 38(4)d – See section 51(1) of the NHRA regarding offences;
- 38(4)e – The following conditions apply with regards to the appointment of specialists:
 - i) If heritage resources are uncovered during the course of the development, a professional archaeologist or palaeontologist, depending on the nature of the finds, must be contracted as soon as possible to inspect the heritage resource. If the newly discovered heritage resources prove to be of archaeological or palaeontological significance, a Phase 2 rescue operation may be required subject to permits issued by SAHRA;
 - The final BAR and EMPr must be submitted to SAHRA for record purposes;
 - The decision regarding the EA Amendment application must be submitted to the SAHRIS application for record purposes.

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

**MANDLAGLO COMMODITIES (PTY) LTD TALA BETHAL COAL MINE
INTEGRATED ENVIRONMENTAL AUTHORISATIONS – BASIC ASSESSMENT
REPORT MP 30/5/1/2/2/10191 MR |MP-00165-MR/102**

Our Ref:



an agency of the
Department of Arts and Culture

T: +27 21 462 4502 | F: +27 21 462 4509 | E: info@sahra.org.za
South African Heritage Resources Agency | 111 Harrington Street | Cape Town
P.O. Box 4637 | Cape Town | 8001
www.sahra.org.za

Enquiries: Natasha Higgitt
Tel: 021 462 4502
Email: nhiggitt@sahra.org.za
CaseID: 20083

Date: Monday January 09, 2023
Page No: 4

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

ADMIN:

Direct URL to case: <https://sahris.sahra.org.za/node/608838>
(DMR-MP, Ref: MP 30/5/1/2/2/10191 MR |MP-00165-MR/102)

Terms & Conditions:

1. This approval does not exonerate the applicant from obtaining local authority approval or any other necessary approval for proposed work.
2. If any heritage resources, including graves or human remains, are encountered they must be reported to SAHRA immediately.
3. SAHRA reserves the right to request additional information as required.