

**Mining Permit Application within portion of portion 12 of the Farm Suikerboschkop 278 JS, under the Magisterial District of Witbank.**

**Our Ref:**



an agency of the  
Department of Arts and Culture

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CaseID: 20517

Date: Monday February 27, 2023  
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## **Interim Comment**

### **In terms of Section 38(3) of the National Heritage Resources Act (Act 25 of 1999)**

Attention: Ngeloz22 Logistics (Pty) Ltd

### **Mining Permit Application within portion of portion 12 of the Farm Suikerboschkop 278 JS, under the Magisterial District of Witbank, Mpumalanga Province.**

Singo Consulting (Pty) Ltd have been appointed by NGELOZ22 Logistics (Pty) Ltd to undertake an Environmental Authorisation (EA) Application for proposed mining activities on portion of portion 12 of the Farm Suikerboschkop 278 JS, near Bulpan, Mpumalanga Province (MP 30/5/1/1/3/13465 MP).

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 activities will include opencast coal mining over a period of two years. Additional activities will include stockpiles, blasting, haul road, weigh bridge, mobile crusher plant, mobile toilet, and rehabilitation.

No heritage assessment that complies with section 38(3) of the National Heritage Resources Act, Act 25 of 1999 (NHRA) as required in terms of section 24(4)b(iii) of NEMA and section 38(8) of the NHRA has been conducted as part of the EA process.

### **Interim Comment**

SAHRA requests that an assessment of the impacts to heritage resources that complies with section 38(3) of the NHRA as required by section 38(8) of the NHRA and section 24(4)b(iii) of NEMA be conducted as part of the EA process.

The assessment must include an assessment of the impact to archaeological and palaeontological resources. The field-based assessment of archaeological resources must be conducted by a qualified archaeologist and the report comply with the SAHRA 2007 Minimum Standards: Archaeological and Palaeontological Components of Impact Assessment Reports (see [www.asapa.co.za](http://www.asapa.co.za) or [www.aphp.org.za](http://www.aphp.org.za) for a list of qualified archaeologists). The standards also refer to a Letter of Recommendation for Exemption for further assessment should the specialist deem it appropriate. SAHRA reserves the right to insist on a field-based assessment

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should the Letter of Recommendation not provide ample information to make an informed comment.

The proposed development is located within an area of very high Palaeontological Sensitivity as per the SAHRIS PalaeoSensitivity map. As such, a field-based Palaeontological Impact Assessment (PIA) must be undertaken by a qualified palaeontologist. (See <https://www.palaeosa.org/heritage-practitioners.html> for a list of qualified palaeontologists). The report must comply with the 2012 Minimum Standards: Palaeontological Components of Heritage Impact Assessments. The standards also refer to a Letter of Recommendation for Exemption for further assessment should the specialist deem it appropriate. SAHRA reserves the right to insist on a field-based assessment should the Letter of Recommendation not provide ample information to make an informed comment.

Any other heritage resources as defined in section 3 of the NHRA that may be impacted, such as built structures over 60 years old, sites of cultural significance associated with oral histories, burial grounds and graves, graves of victims of conflict, and cultural landscapes or viewsapes must also be assessed.

The applicant is advised to extend the EA process in terms of section 19(1)b of the NEMA Regulations in in order to address this comment. Further comments will be issued upon receipt of an amended BAR documents inclusive of appendices that includes the results of the requested heritage assessments.

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  
Manager: Development Applications Unit  
South African Heritage Resources Agency

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**ADMIN:**

Direct URL to case: <https://sahris.sahra.org.za/node/611913>  
(DMR-MP, Ref: MP 30/5/1/1/3/13465 MP)