



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: 021 202 8660  
Email: nhiggitt@sahra.org.za  
CaseID: 22074

Date: Monday September 11, 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: Seriti Power (Pty) Ltd

**Seriti Power is applying for a mining right and environmental authorisation for the Naudesbank Project. Both underground and opencast mining is planned. The project area extends over various portions of the farms Vaalbult 3 IT, Steynsdraai 46 IT, Jaglust 47 IT, Twyfelaar 171 IS, Naudesbank 172 IS, Kromkrans 208 IS and Vaalwater 173 IS.**

Zyntha Consulting (Pty) Ltd has been appointed by Seriti Power (Pty) Ltd to undertake an Environmental Authorisation Application for proposed mining activities on the various portions of the farms Vaalbult 3 IT, Steynsdraai 46 IT, Jaglust 47 IT, Twyfelaar 171 IS, Naudesbank 172 IS, Kromkrans 208 IS and Vaalwater 173 IS, near Carolina, Mpumalanga Province (MP 30/5/1/2/3/2/1 (10389) EM).

A Draft Environmental Impact Assessment Report (DEIA) 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 include opencast and underground mining, on-site crushing and screening plant, workshops, offices, change houses, water management infrastructure, access roads, sub-station, diesel bay and stockpiles.

Dr Heidi Fourie and APelser Archaeological Consulting were appointed to provide heritage specialist input into the EA process in terms of section 24(4)b(iii) of NEMA and section 38(8) of the National Heritage Resources Act, Act 25 of 1999 (NHRA).

*Fourie, H. 2023. Palaeontological Impact Assessment: Phase 1 Field Study: Proposed Naudesbank Colliery*

The proposed development footprint is underlain by the Vryheid Formation however no fossils were identified during the site visit. A Chance Finds Procedure is recommended to be implemented.

*Pelser, A. 2023. A Phase 1 Heritage Impact Assessment & Report for the proposed Naudesbank Mining Development on portions of the farms Vaalbult 31IT, Vaalwater 173IS, Twyfelaar 171IS and Naudesbank 172IS located between Hendrina and Carolina in the Mpumalanga Province*

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A total of 17 heritage resources were identified within the proposed development boundary. These include historical structures of low to high heritage significance, and burial grounds of high heritage significance.

Recommendations provided in the report include the following:

- Historical structures are to be assessed by an Architectural Historian to determine their cultural heritage significance and recommend on the way forward should the site be directly and negatively impacted by the proposed mining development;
- Care should be taken if the historical structures are to be demolished should the proposed mining activities impact on the site, as there is always the possibility of unmarked burials (of still-born infants or young children) in or close to the houses;
- The burial grounds are to either be managed in-situ or mitigated if the mining development will impact them.

## Interim Comment

SAHRA requests that the HIA be revised to include the assessment of the historical structures by an Architectural Historian so that SAHRA has sufficient information to make an informed comment. Additionally, clear indications whether the burial grounds will be impacted by the proposed development or not must be provided. Further comments will be provided upon receipt of the above. Finally, the location of the development must be mapped on the application.

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/621878>