



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: Nokukhanya Khumalo

Tel: 021 462 4502

Email: nkhumalo@sahra.org.za

CaseID: 14566

Date: Tuesday December 17, 2019

Page No: 1

Interim Comment

In terms of Section 38(3), 38(8) of the National Heritage Resources Act (Act 25 of 1999)

Attention: Glencore Operations South Africa (Pty) Ltd

GOSA has appointed Golder Associates Africa (Pty) Ltd (Golder) as an independent environmental assessment practitioner (EAP) to undertake the regulatory application process for the proposed the expansion of the South Pit and Venture Dump discard facilities at their iMpunzi Mining Complex. The proposed South Pit Discard Dump will receive coarse discard from the Phoenix Plant. The South Pit is a previously mined-out area and has been partially rehabilitated. The existing Venture Discard Dump footprint will be expanded and the facility will be modified into a co-disposal facility to accommodate both coarse and fine (slurry) discard. A new return water dam (RWD) will be constructed as part of the development of the Venture Co-disposal Facility. The co-disposal facility will receive coarse discard and slurry from the ATC Plant, which sources coal from opencast workings and from discard dump reprocessing. As part of the proposed discard expansion project, an existing haul road from the ATCOM Discard Dumps to the ATC Coal Processing Plant will be widened

Glencore Operations South Africa (Pty) Ltd appointed Golder Associates Africa (Pty) Ltd to undertake the Environmental Authorisation application for the proposed expansion of the South Pit and Venture Dump discard facilities at their iMpunzi Mining Complex in the Klipplaats 14 IS Portions 1 and 14, Kromfontein 30 IS Portions 2, 3, 12, 14, 20, 22, 23, and 28 and Blesbokfontein 31 IS Portion 2 in the Magisterial District of eMalahleni, Mpumalanga Province.

A draft Scoping Report is submitted for environmental authorizations in terms of the National Environmental Management Act, 1998 and the National Environmental Management Waste Act, 2008 in respect of listed activities that have been triggered by applications in terms of the Mineral And Petroleum Resources Development Act, 2002 (MPRDA) (as amended).

The physical extent of the entire iMpunzi Complex for which there is an existing mining right extends over approximately 6 835 ha. The development will extend over 267Ha of the mining right area. The Venture Discard Dump footprint will be expanded and the facility will be modified into a co-disposal facility to accommodate both coarse and slurry discard. The current pollution control dam (PCD) will be replaced with a larger water storage facility to the north west of the current Venture Discard Dump. The existing haul road will be widened and the proposed South Pit Discard Dump will be located on an area which was historically



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Page No: 2

opencast mined (South Pit).

Interim Comment

The SAHRA Archaeology, Palaeontology and Meteorite (APM) unit notes in the draft Scoping Report that the proposed activities will take place on areas that were previously mined and rehabilitated. No cultural/heritage resources close enough to the proposed activities to be impacted were found, and the possibility of chance finds during construction and mining cannot be ruled out.

As per section 38(8) of the National Heritage Resources Act, Act 25 of 1999 (NHRA) and section 24(4)d(iii) of the NEMA EIA Regulations, an assessment of heritage is required as part of a NEMA EA application. The assessment must comply with section 38(3) of the NHRA. A heritage practitioner must be appointed to conduct the Heritage Impact Assessment (HIA) which must be submitted to the case file on SAHRIS as part of the EA Application for the expansion the of the South Pit and Venture Dump discard facilities application.

The HIA must include a detailed Archaeological Impact assessment and it must comply with section 38(3) of the National Heritage Resources Act, Act 25 of 1999 (NHRA). The AIA must comply with the SAHRA 2007 Minimum Standards: Archaeological and Palaeontological Component of Impact Assessments. See www.asapa.org.za or www.aphp.org.za for a list of specialists that would be able to provide an AIA.

As the proposed development area was previously mined and rehabilitated, a Letter of Recommendations for Exemption may be submitted if the specialist deems it appropriate. The exemption letter should include a map of the development, photos and a track log.

Furthermore, the proposed prospecting location is in an area of very high palaeontological sensitivity as per the SAHRIS PalaeoSensitivity map, therefore, a field based palaeontological study must be done. The report must comply with the SAHRA 2012 Minimum Standards: Palaeontological Component of Heritage Impact Assessments (a list of qualified paleontologists is available. See www.palaeosa.org).

Any other heritage resources as defined in section 3 of the NHRA that may be impacted, such as maritime archaeology, 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 SAHRA APM unit awaits the HIA to be submitted before any further comments can be issued.

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Page No: 3

Should you have any further queries, please contact the designated official using the case number quoted above in the case header.

Yours faithfully

Nokukhanya Khumalo
Heritage Officer
South African Heritage Resources Agency

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

ADMIN:

Direct URL to case: <http://www.sahra.org.za/node/530984>
(DMR-MP, Ref: iMpunzi 375MR)

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.