



an agency of the
Department of Arts and Culture

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South African Heritage Resources Agency | 111 Harrington Street | Cape Town
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CaseID: 14566

Date: Thursday October 01, 2020

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Final Comment

In terms of Section 38(4), 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.

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 opencast mined (South Pit).

The SAHRA issued an interim comment dated 17/12/2029 which requested that heritage studies inclusive of the Archaeological and Palaeontological Impact Assessments.



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On the 11/02/2020, the Final Scoping Report was submitted to SAHRA via email. A response was given to the email on the 17/02/2020 which noted the final Scoping Report and requested that the report be attached to the SAHRIS case. It was also requested of the EAP to submit the EIA document along with its appendices and the heritage specialist reports to the case on SAHRIS for further comments once the FSR has been accepted by the competent authority.

The applicant has failed to comply with the interim comment issued on the 17/12/2019 for the application and submitted only the dEIA with no assessment of the impacts to the archaeological and palaeontological heritage resources. However, these statements were not provided by a qualified heritage specialist as per the requirements of section 38 of the NHRA. The draft Environmental Impact Assessment (dEIA) documents were then submitted to the case on the 01/09/2020, which states that an Archaeological and Cultural Heritage Impact Assessment was not undertaken as the footprints of the above mentioned activities will largely be situated on previously mined-out areas. It also states that a Palaeontology Impact Assessment was not undertaken as the footprints of the above mentioned activities will largely be situated on already mined-out areas.

Final Comment

The SAHRA Archaeology, Palaeontology and Meteorites (APM) Unit cannot endorse this proposed development as an assessment of the impacts on archaeological and palaeontological heritage resources has not been undertaken as required by 38(3) of the National Heritage Resources Act, Act 25 of 1999 (NHRA) and as part of the EA process as required by section 24(4)b(iii) of the NEMA. SAHRA advises the Department of Mineral Resources and Energy (DMRE) to reject the application for the expansion of the South Pit and Venture Dump discard facilities at their iMpunzi Mining Complex.

This comment must be forwarded directly to the competent authorities and proof of the submission and receipt thereof must be provided to SAHRA.

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

Yours faithfully

Our Ref: 14566



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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>
(, Ref:)

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.