



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: Tuesday February 02, 2021

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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 SAHRA issued an interim comment dated 17/12/2019 which requested that heritage studies inclusive of the Archaeological and Palaeontological Impact Assessments be submitted to the case on SAHRIS.

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.

On the 01/09/2020 for the application and submitted only the dEIA with no assessment of the impacts to the archaeological and palaeontological heritage resources. On the 01/10/2020, the SAHRA issued a Final Comment which advised the Department of Mineral Resources and Energy (DMRE) to reject the application



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for the expansion of the of the South Pit and Venture Dump discard facilities.

On the 23/10/2020, a Heritage Compliance Statement was submitted to the case on SAHRIS in response to the SAHRA's Final Comment. The PIA component of the Heritage Compliance Statement was submitted on the 09/12/2020.

APelser Archaeological Consulting cc (APAC cc) and Heidi Fourie Consulting were appointed to provide the motivation for exemption from a full Phase 1 Heritage Impact Assessment (HIA).

The area would have been used in pre-mining mainly for agricultural purposes and extensive mining activities over the last 20 years have had a major impact on the area. As a result features or material of cultural heritage origin or significance which would have exist within the area would have been extensively disturbed or destroyed. Archaeological and historical sites features and material have been identified in the larger geographical area and this needs to be taken into consideration during any future actions related to the proposed development.

The development area is underlain by the Vryheid Formation that is very highly sensitive in terms of palaeontological heritage. The impact significance for palaeontological heritage will be LOW since the development will take place on the already mined out, disturbed and partially rehabilitated pit/opencast mining areas. It is recommended that the exemption from undertaking a full Phase 1 Heritage Impact Assessment (HIA) be granted. A Chance Finds Protocol and Management Plan has been attached.

Final Comment

The following comments are made as a requirement in terms of section 3(4) of the NEMA Regulations and 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 has no objections to the proposed development;

38(4)b – The recommendations of the specialists are supported and must be adhered to. No further additional specific conditions are provided for the development;



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38(4)c(i) – If any evidence of archaeological sites or remains (e.g. remnants of stone-made structures, 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 (Nokukhanya Khumalo/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/Mimi Seetelo 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;

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 EIA and EMPr must be submitted to SAHRA for record purposes;

The decision regarding the EA Application must be communicated to SAHRA and uploaded to the SAHRIS Case application.

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: <https://sahris.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.