



## **Interim Comment**

### **In terms of Section 38(8) of the National Heritage Resources Act (Act 25 of 1999)**

Attention: Optimum Coal Mine (Pty) Ltd  
Private Bag X1201  
Pullenshope  
1096

### **POPOSED KWAGGA NORTH PROJECT ON PORTIONS OF THE FARMS KOPERMYN 435 JS, MOOIFONTEIN 448 JS, TWEEFONTEIN 458 JS, BOSMANSPRUIT 459 JS AND KWAGGAFONTEIN 460 JS, ARNOT, MPUMALANGA.**

*Fourie, W. (September 2012). Follow-Up Evaluation as required by HIA Compiled for Optimum Colliery – Kwagga North Project, Mpumalanga*

Thank you for the above additional information submitted to SAHRA in May 2013. SAHRA's comment dated 17 April 2013 required the following, among other things;

- Due to the significance of the Ndebele mural work on existing structures in the development area, **a specialist study is required** to determine the impact of the proposed development to the intangible heritage of the project area. The grading of this significant resource in terms of the National Heritage Resources Act (Act 25 of 1999) must be determined and an appropriate way forward presented to SAHRA for assessment.

The above submitted study satisfies this requirement.

The above report identified a cluster of approximately 12 Ndebele homesteads in the study area. Ndebele Highveld architecture developed a distinct identity that dates back to the 1890's. According to the report, clusters of this size are becoming increasingly rare on Highveld farms. This decline is attributed to escalating costs of material and paint as well as to urbanisation.

A great majority of the walls of the Ndebele structures are painted in monochromatic light blue or turquoise, some are in earthen colours and some are not even painted. Very few have the distinct geometric patterns of the Ndebele. Most of the structures have corrugated roof sheeting as grass thatching has become too labour intensive. Based on this information, the identified resource seems to be less significant than originally proposed.

The above report also investigated the intangible heritage associated with the identified homesteads. The findings of the report were that the local headman supervises the quadrennial male initiation rituals - the next of which is proposed for April to July 2013. As such, the intended relocation of the community will have a significant impact on this ritual.

### **Comment**

Based on the information contained in the above report, as well as the report dated October 2009, SAHRA





requires that;

- The identified Ndebele homesteads are significant in terms of local heritage only and are thus assigned low heritage significance. No further mitigation is required in terms of these resources.
- All identified cemeteries and grave sites must be fenced and have a 10m buffer zone of no impact. A Conservation Management Plan must be drafted and included in the EMP for the continued management and conservation of these cemeteries and graves.
- The structure identified in the 2009 report as Site 26 must not be impacted by the proposed mining activities without the consent of the owner and a permit from the Mpumalanga Provincial Heritage Resources Authority (Mr B. Moduka: [bmoduka@mpg.gov.za](mailto:bmoduka@mpg.gov.za) or 013 766 5198).
- Due to the significance of the palaeontological resources known from the Eccca Group, **a Desktop Palaeontological Impact Assessment is required** to be submitted to SAHRA for comment before a Final Comment can be issued.

Should it not be possible to adhere to the above conditions, the applicant must consult with SAHRA regarding the reasons for non-compliance. In this instance, on SAHRA's advice, other mitigation strategies may have to be adopted which will require following a process for archaeological or palaeontological investigation in terms of Section 35 and for exhumation in terms of Section 36 of the NHRA (Act 25 of 1999).

It must be noted that should any of the structures identified in the report require alteration or demolition, a permit must first be granted for this work by the Mpumalanga Provincial Heritage Resources Authority (Mr B. Moduka: [bmoduka@mpg.gov.za](mailto:bmoduka@mpg.gov.za) or 013 766 5198) in terms of Section 34 of the NHRA (Act 25 of 1999).

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

Yours faithfully

Jenna Lavin  
Heritage Officer  
South African Heritage Resources Agency



## Kwagga North project

Our Ref: 9/2/204/0004

Enquiries: Jenna Lavin  
Tel: 021 462 4502  
Email: [jlavin@sahra.org.za](mailto:jlavin@sahra.org.za)  
CaseID: 1803

Date: Wednesday May 15, 2013

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Colette Scheermeyer  
SAHRA Head Archaeologist  
South African Heritage Resources Agency

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### ADMIN:

Direct URL to case: <http://www.sahra.org.za/node/114746>



The South African Heritage Resources Agency

Street Address: 111 Harrington Street, Cape Town 8000 \* Postal Address: PO Box 4637, Cape Town 8000  
\* Tel: +27 21 462 4502 \* Fax: +27 21 462 4509 \* Web: <http://www.sahra.org.za>