



Final Comment

In terms of Section 38(8) of the National Heritage Resources Act (Act 25 of 1999) and the KwaZulu-Natal Heritage Act (Act 4 of 2008)

Attention: Mbila Resources

Mbila Resources intends commencing with underground mining activities at the Mbila Anthracite Mine. The initial stages of underground mining will take place over 5 years at a rate of 20 000 tons per month and entails the development of a shaft / adit, a coal handling and processing plant near the Tribal Court at Esiphambanweni and a new haul road connecting these areas. The Mbila Underground Mine is to be developed over a portion of Portion 9, Reserve 12, no. 15832 HU, within the Nongoma Local Municipality and the greater Zululand District Municipality, KwaZulu-Natal Province.

We acknowledge receipt of your invitation for comment with regards to the proposed development. The survey of the development area revealed presence of heritage resources in the general area or vicinity of the area of proposed development.

The Heritage Impact Assessment Report by Dr. AC van Vollenhoven noted presence of two sites while the paleontological field survey by Rose Prevec exposed **7 plant fossil sites**. This is an indication of the high potential of exposure of more sites in the area. The Archaeological sites are described in the report as follows :

- Site 1 – Graveyard with **at least 32 graves** mostly stone packed with or without headstones, a few have cement dressings and headstones.
- Site 2 – **Late Iron Age/ Historical site**, a circular stone walled enclosure used as a **cattle kraal**. A **lower grinding stone** is built into the wall and an **upper grinder** is placed on top thereof. A **monolith** is also found on the wall. It is far enough from the development area.

The following mitigation procedures should be adhered with:

- A Cultural Heritage Management Plan (CHMP) should be developed by an Amafa accredited Heritage Practitioner to ensure that both the Archaeological sites and Paleontological Sites are well protected from damage or disturbance. The Cultural Heritage Management Plan should be developed in consultation with the interested and affected parties or next of kin. It should be lodged with Amafa for approval before commencement of development activities.
- No graves should be damaged, disturbed, altered, exhumed or removed without a permit from Amafa and approval of next-of kin or community in which the graves are located.
- As a general rule no development is allowed within 25m of any heritage resources.
- A section of the fossil area should be isolated for Grade 3 proclamation.
- On-site monitoring by a trained ECO is required, with regular inspections by and interactions with a





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qualified palaeontologist capable of effectively mitigating damage to fossil heritage during mining and development.

Development may only proceed after approval of CHMP by Amafa. The developer and construction team is also required to adhere to the below-mentioned standard conditions:

Conditions:

1. Amafa should be contacted if any heritage objects are identified during earthmoving activities and all development should cease until further notice.
2. No structures older than sixty years or parts thereof are allowed to be demolished altered or extended without a permit from Amafa.
3. No activities are allowed within 50m of a site, which contains rock art.

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

Yours faithfully

Bernadet Pawandiwa
Senior Heritage Officer
Amafa/Heritage KwaZulu Natal

Annie van de Venter Radford
Deputy Director: Research, Professional Services and Compliance
Amafa/Heritage KwaZulu Natal

ADMIN:

Direct URL to case: <http://www.sahra.org.za/node/161312>
(DAEA, Ref: KZN/EIA/0001423/2014)

Terms & Conditions:



**Amafa AkwaZulu-Natal
Heritage KwaZulu-Natal
Erfenis KwaZulu-Natal**

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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 Amafa immediately.
3. Amafa reserves the right to request additional information as required.

