



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: John Pakwe
Tel: (063) 894-1979
Email: jpakwe@sahra.org.za
Case ID: 23784

Date: Friday, 30 May, 2025

Final Comment

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

Luyanda Khala
Geovicon Environmental
Nungu Industrial Park
13 Dr. Mandela Drive & Newton street
Middelburg
1050

Geovicon Enviromental (Pty) Ltd was appointed by Trentra (Pty) Ltd to undertake Environmental Authorisation (EA) application for the proposed Mpfumelo Colliery (Bankontein Colliery during Scoping Phase) on Portions 19 and 47 of Farm Bankontein 375 JS within the Steve Tshwete Local Municipality, Mpumalanga Province. MP 30/5/1/2/2/10455 MR.

A draft Environmental Impact Assessment report (EIAR) was submitted in terms of the National Environmental Management Act, Act 107 of 1998 (NEMA) and the Environmental Impact Assessment (EIA) for activities that trigger the Minerals and Petroleum Resources development Act, Act 28 of 2002 (MPRA).

The project is divided into two mining sections- South and North Block mining areas. The associated infrastructure and facilities that will be constructed include access/haul roads, box-cut, overburden stockpiles, topsoil stockpile, R.O.M./product stockpiles, water management structures, processing plant for crushing, screening, and washing, discard dump, diesel storage facility, weighbridge, mine/contractor's offices, and workshop.

Dr. Heidie Fourie and Archætnos Culture & Cultural Resource Consultants were appointed to undertake specialist Palaeontological and Heritage Impact Assessments for input in the EIA process in terms of section 38(8) of the National Heritage Resources Act, Act 25 of 1999 (NHRA) and section 24(4)b(ii) of NEMA.

Fourie, H., 2025. Palaeontological Impact Assessment, Trentra (Pty) Ltd, Steve Tshwete Local Municipality, Nkangala District Municipality, Mpumalanga Province, Farm Portion 19 and 47 Bankfontein 275 IS: Phase 1 Field Study.

The field studies did not identify any fossil heritage resources within the proposed development footprint.



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: John Pakwe
Tel: (063) 894-1979
Email: jpakwe@sahra.org.za

Date: Friday, 30 May, 2025

Case ID: 23784

van Vollenhove, A.C & Smith, J., 2025. A report on an archaeological impact assessment for Trentra (Pty) Ltd Bankfontein Colliery on Portion 19 and 47 of the Farm Bankfontein 375 JS, in the Nkangala District, Mpumalanga Province, Republic of South Africa.

Three sites of cultural heritage significance were identified during the impact assessment. Sites 1 and 2 are farmstead structures with a locally moderate heritage significance. Site 3 is a cemetery located outside the development footprint.

Recommendations made by specialist studies.

- Chance Finds Protocols must be implemented for the potential existence of heritage resources underground.
- For Sites 1 and 2, a section 34 of the NHRA permit must be obtained should there be a need to either alter or demolish them.
- For Site 3, a site preservation and management plan and engagements with the local community must be implemented. If any graves are affected, construction must stop immediately, and a heritage consultant must be contacted.

Final Comment:

The following comments are made as 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 EIA and EMP.

- 38(4)a – The SAHRA Development Applications Unit (DAU) has no objections to the proposed development;
- 38(4)b – The recommendations of the specialists are supported and must be adhered to. Further additional specific conditions are provided for the development as follows:
 - Site 3 must be clearly marked and demarcated with a 30 m buffer from the development footprint. Should the 30 m buffer be difficult to observe, a permit in terms of section 36 of the NHRA must be obtained to either exhume and relocate or disturb the graves;
 - For Sites 1 and 2, a 50 m buffer-zone must be implemented, or a permit in terms of section 34 of the NHRA must be obtained to either demolish, disturb or alter the sites.
- 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



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: John Pakwe
Tel: (063) 894-1979
Email: jpakwe@sahra.org.za

Date: Friday, 30 May, 2025

Case ID: 23784

concentrations), fossils or other categories of heritage resources are found during the proposed development, SAHRA DAU (John Pakwe 0638941979 / jpakwe@sahra.org.za) must be alerted as per section 35(3) of the NHRA. Non-compliance with this 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 of the NHRA regarding offences;
- 38(4)e – The following conditions apply with regards to the appointment of specialists: 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 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

John Pakwe
Heritage Officer: Development Applications Unit
South African Heritage Resources Agency



an agency of the
Department of Arts and Culture

Enquiries: John Pakwe
Tel: (063) 894-1979
Email: jpakwe@sahra.org.za
Case ID: 23784

Date: Friday, 30 May, 2025

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

Natasha Higgitt
Manager: Development Applications Unit
South African Heritage Resources Agency

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.

ADMIN:

Direct URL to case: <https://sahris.org.za/node/353814>