



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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Enquiries: John Pakwe  
Tel: (063) 894-1979  
Email: [jpakwe@sahra.org.za](mailto:jpakwe@sahra.org.za)  
Case ID: 23985

Date: Wednesday, 9 April, 2025

## Final Comment

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

Inzalo Crushing and Aggregates (Pty) Ltd (hereafter referred to as the applicant) proposes to establish an area for stockpiling and crushing/screening (if needed) of mined material, on 13.6 hectares on a portion of Portion 7 of the farm Roodekrans 457, Administrative district IS, Mpumalanga Province. The infrastructure to be used on site will all be of temporary and mobile nature. Containers will be used for office and storage purposes and a weigh bridge will be established (temporary). The storage of fuel (if any) will be below the threshold of the NEMA EIA listed activities. The proposed stockpile area, and the plant will be powered with generators. The ablution facilities will be chemical toilets that will be serviced by registered suppliers. The office and storage containers, weigh bridge and ablution facilities will most likely be placed at the entrance to the site, while the crushing equipment will be of mobile nature, moving around the site as needed.

**Stockpile application on a portion of Portion 7 of the farm Roodekrans 457, Administrative district IS, Mpumalanga Province**  
**Province(s): Mpumalanga**

Chris Weideman  
Inzalo Crushing and Aggregates (Pty) Ltd  
PO Box 26730  
East Rand  
Kempton Park  
1462

Greenmined Environmental was appointed by Inzalo Crushing and Aggregates (Pty) Ltd to undertake an Environmental Authorisation (EA) application for the proposed Stockpile, Crushing and Screening Area on Portion 7 of Farm Roodekrans 457 within the Lekwa Local Municipality, Mpumalanga.

A draft Basic Assessment Report (dBAR) was submitted in terms of the National Environmental Management Act, Act 107 of 1998 (NEMA) and the Environmental Impact Assessment Regulations, 2014 as amended (EIA). The proposed development includes the clearance of site and removal of topsoil, stockpiling of dolerite product, crushing and screening infrastructure, temporary containers for office and storage utilization, as well as ablution facilities. The total development footprint is 13.6 ha/136 000 m<sup>2</sup>.



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Beyond Heritage (Pty) Ltd was appointed to undertake a specialist Heritage Impact Assessment for input in the EIA process in terms of section 24(4)b(ii) of NEMA and section 38(8) of the National Heritage Resources Act, Act 25 of 1999 (NHRA).

*Kraljevi?, L., 2025. Heritage Impact Assessment for the Proposed Roodekrans Mining Permit and Stockpile Near Morgenzon, Mpumalanga Province.*

On Stockpile 1, the assessment identified a burial ground containing approximately 35 graves (RD001) considered to be of high heritage significance. Furthermore, sites RD002, RD003 and RD004 were identified, however, they have not had their age, purpose or significance confirmed due to the overgrown vegetation and there is uncertainty of whether an archaeological deposit exists. No heritage resources were identified on Stockpile 2. All these sites will be affected by the proposed development on the preferred Stockpile 1. No studies required for Palaeontology as the proposed development footprint lies on the negligible PalaeoSensitivity in terms of the SAHRIS PalaeoSensitivity Map.

Recommendations made by the specialist report:

- A buffer zone of a 100 m around site RD001 containing identified graves.
- Buffer zones of 30 m must be observed around RD002, RD003 and RD004 with the layout plan adjusted to incorporate such no-go areas.

A letter of request for the relaxation of the recommended buffer zone around site RD001 has been submitted.

*Norval, Z. 2025. Letter from Zoë Norval to the SAHRA DAU. [Letter]. Request for Approval of 40 m Buffer-Zone Around Identified Graves on Portion 7 of the Farm Roodekrans 457 Administrative District IS, Mpumalanga Province.*

Greenmined Environmental is requesting for a reduction of the recommended 100m buffer zone to 40m around the graves identified on the proposed mining permit and stockpile application areas. The request was supported by a Blasting Report prepared by BME Blasting Solutions.

*Sefara, P., Letoka M., Phiri, T. 2025. Roodekrans Quarry: Blast Proposal Report for Blasing Closer to Heritage Sites.*



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The normal tolerable vibration for graves is stipulated as 150mm/s. However, in this case, the maximum limit will be reduced to 50mm/s due to the condition of the graves. The maximum generated vibrations at 40m distance from RD001 are calculated as 91.5mm/s, which is higher than the 50mm/s tolerable limit. This then introduces a concept of decking, which is the separation of explosive charge within a blast that will fire at different delays.

The current blast designs may be applicable to a distance of 60m from the graves, or decking may be introduced between 60m to 40m, and a crushed aggregate must be used as a suitable stemming material. Scaled Depth of Burial (SDOB) is used to estimate the Flyrock range which confirmed that it may impact on RD001 and it is estimated to travel beyond a 100m radius.

#### **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:
  - Based on the Blasting Report, the SAHRA DAU is approving the reduction of the 100m buffer zone around site RD001 to 40m with decking due to the number of graves and unknown SDOB of all graves, and to mitigate the impacts of Flyrock. If the implementation of this condition is not possible, a permit in terms of section 36 of the NHRA for the Grave Relocation Process must be obtained and process completed prior to construction activities.
- 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 DAU (John Pakwe 0638941979 / [jpakwe@sahra.org.za](mailto: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 offence 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



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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

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

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

Terms & Conditions:



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

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**ADMIN:**

Direct URL to case: <https://sahris.org.za/node/354830>