MINING ACTIVITY NEAR HWANGE NATIONAL PARK

Last year on the 10th & 11th September 2010 a fly over of Hwange National Park (HNP) revealed increased mining activity in and around the Sinamatella area. In addition to the mining carried out by Hwange Colliery Company Limited there are now at least 3 other coal mining developments, two adjoining HNP and one actually within the Park – see maps 1 & 2. More details about these mining operations are given below.

This mining activity is of grave concern. The associated building of roads and increased human activity is bound to lead to an increase in poaching as the area is opened up, access becomes easier, and there are more people in the area to carry out the poaching and to buy the poached meat.

Further Sinamatella is a rhino intensive protection zone (IPZ). The survival of rhino throughout southern Africa is in doubt due to the ongoing slaughter of these animals for their horn. The IPZs have proved successful but it will be extremely difficult for the Parks & Wildlife Management Authority (PWMA) to monitor and protect the rhino in the Sinamatella IPZ with all the additional traffic and activity resulting from these various mining operations both within the IPZ and on its boundaries.

Of even greater concern is the total devastation of large tracts of land in what until recently was a wilderness area. Whilst wildlife populations may recover, or be reintroduced, if poaching can be brought under control, it may not be possible to restore the wildlife once the habitat has been destroyed.

These mining operations are a threat not only to Zimbabwe’s wildlife but also to its cultural and archeological resources. One of the mines (see Mine 3 below) is within a few kilometers of the Bumbusi Ruins, which is a national monument. In addition to the stone ruins, where Late Stone Age tools have been found, there are unusual sandstone engravings – see Appendix 2. In recent years National Museums and Monuments have undertaken an excavation in the area and it is believed there are many more archeological finds to be made – unless they are destroyed during bush clearing and mining.

According to the Parks and Wild Life Act no one may mine within a national park unless they have a written agreement signed by the Minister of Environment and Tourism (see appendix 1 for a copy of the Act, chapter 20:14 section 119 Prospecting and Mining). To date it has not been established if any of the three mines has such an agreement. Before any of these developments began an environmental impact assessment (EIA) should have been completed – and the Environmental Management Policy requires this to be done. With this in mind the Provincial Environmental Manager (PEM) Matabeleland North & Bulawayo provinces, Mrs Mpofu Sesu said she was not aware of any new mining developments taking place in the Sinamatella area nor was she able to find a record of any EIAs having been done. The PEM subsequently visited the area but only managed to find one of the mines (see Mine 1 below).

While it is accepted that mining within, or near, a national park may be unavoidable we believe that mining operations such as these must be carefully controlled and monitored. In the past exploratory mining has been conducted within national parks with little or no damage to the environment. For example in the mid nineties: Rio Tinto looked for diamonds in HNP – trenches were dug but almost immediately filled and the area rehabilitated; and Mobil looked for oil in the Zambezi Valley – no new roads were built, equipment was moved in by helicopter, and test holes were filled. The Environmental Management Authority (EMA), the Parks & Wildlife Management Authority and the mining companies themselves should be making public what development is planned, and what measures have been put in place to protect the environment.

This report focuses on Hwange National Park and its surroundings but similar destruction of our environment through mining activities is taking place in other parts of the country, for example by mining for chrome in the Mavhuradonha mountains in Mashonaland Central province.
Below are some details about the three new mining developments in Hwange.

Map 1 – showing Hwange town, and Main, Sinamatella and Robins camps within HNP - see enlargement below

Map 2 – showing locations of Mines 1, 2 & 3
MINE 1.  - ALONG HWANGE - SINAMATELLA ROAD

This mine is located outside HNP about 10 km from Hwange town along the road leading to Sinamatella. The mine was visited in October by the PEM who said that the operations appeared to be conforming to required environmental standards. The mining is apparently being done by a company called Makomo Resources¹.

MINE 2.  - AT THE CHAWATO SPRINGS

This mine is at Chawato Springs, an area frequented by game, immediately adjacent to the HNP boundary and Sinamatella IPZ, and within the Deka Safari Area. Mining in this area was first observed during the 2009 fly over when a number of roads and a large opencast pit were seen from the air. After a public outcry, articles in the press and questions being asked in parliament it was believed that this mining activity had been stopped. However during this year’s fly over considerable development was observed with a lot more roads in the area and a second equally large opencast pit - see photographs 3 to 9.

On a recent visit to this area in 2010 a contractor to the mining company said the coal being mined was of a poor quality and consequently the mine is to be shut down. Even if this is true there is still the problem of what is going to be done to rehabilitate the area.

The mining is apparently being done by a company called Post Mining in what is intended to be a joint venture with the Zimbabwe Power Corporation but the joint venture is still being negotiated.

---

¹ Makomo Resources, a company owned by a consortium of Zimbabwean businessmen will sink $40 mln in coal exploration at Entuba coalfields in Hwange and the company envisages to produce at least 60 000 tonnes of coal in the first month which will then rise to 150 000 tonnes a month at full capacity – HERALD. 27.09.2010
Photo 4 - aerial photo of the mine at Chawato Springs taken during the fly over of HNP in September 2010. The opencast pit is considerably larger than it was the year before, there are more and wider roads, and additional bush clearing. In the background on the right can be seen a second opencast pit which has been developed during the last year.

Photo 5 - aerial photo of the mine at Chawato Springs, September 2010, taken from another angle to show new pit and further bush clearing. In the background on the right can be seen the original pit and coal stockpile.
**Photo 6** - view of the original opencast pit taken at ground level. Elephant spoor was observed on the road about 100m from where this photo was taken. September 2010.

**Photo 7** - view from the air showing new road from Hwange town, built parallel to the old road since 2009
Photo 8 - view of one of the roads from ground level showing width and amount of bush clearing involved. Besides the actual damage that is done to the environment in the course of building these roads, the roads also make the area more accessible to potential poachers. September 2010.

Photo 9 - a closer view of some of the land that has been bush cleared.
This mine is within HNP along the road between Sinamatella and Bumbusi camp. At the time of the game count mining had not actually started in this area but large areas of land have been bush cleared and roads built - see photographs 10 & 11. In addition a large thatched lapa has been constructed by the mining company close to the Bumbusi road. A retaining wall has been built across a stream in front of the lapa, which in the rainy season will collect water. While it could be argued that any additional water source in HNP should be welcome, it appears that this development has gone ahead without any EIA or PWMA planning approval. In conversation with Parks’ staff at Sinamatella they have said that as far as they are aware Parks were not given the opportunity to comment on the development, that they have not seen an EIA and are not aware of what conditions, if any, have been put in place to safeguard the environment, and that letters sent expressing their concern have received no response.

Photo 10 - a panoramic view showing the width of the roads and the amount of bush clearing involved.

Photo 11 - view of the lapa built within HNP alongside the access road leading from Sinamatella to Bumbusi Camp. This road can be seen cutting across the photo in the foreground. In the middle right can be seen the wall which has been built across a stream. Once the rains come this little dam will fill providing a water hole in front of the lapa.
(4) Where the President considers that it is in the public interest to do so, he may assent to the proposed exercise of any rights referred to in subsection (1) notwithstanding that the exercise will unduly interfere with the purposes for which the national park, botanical reserve, botanical garden, sanctuary, safari area or recreational park concerned was constituted and may fix such terms and conditions as he considers to be necessary or desirable.

118 Servitudes in respect of national parks, etc.

(1) No servitude in, over, under or through a national park, botanical reserve or botanical garden, sanctuary, safari area or recreational park shall be granted unless—
(a) the Minister has approved of the grant in terms of paragraph (a) of subsection (2); or
(b) the President has assented to the grant in terms of paragraph (b) of subsection (2); and any other enactment that are applicable have been complied with.

(2) If the Minister is of the opinion that the servitude in respect of which his approval is sought—
(a) will not unduly interfere with the purposes for which the national park, botanical reserve, botanical garden, sanctuary, safari area or recreational park is constituted, he may approve of the grant of a servitude in, over, under or through any such place; or
(b) will unduly interfere with the purposes for which the national park, botanical reserve, botanical garden, sanctuary, safari area or recreational park is constituted but that the servitude concerned will be in the public interest, he shall refer the matter to the President who may assent to the grant of the servitude.

119 Prospecting and mining

(1) No person shall prospect in terms of the Mines and Minerals Act [Chapter 21:05] within a national park, botanical reserve, botanical garden, sanctuary or recreational park except—
(a) in terms of a permit issued by the Minister with the content of the Minister of Mines; or
(b) in accordance with any prospecting rights lawfully acquired in respect of the area of the national park, botanical reserve, botanical garden, sanctuary or recreational park before the date when such area became a national park, botanical reserve, botanical garden, sanctuary or recreational park.

(2) No person shall acquire or work any mining location in terms of the Mines and Minerals Act [Chapter 21:05] within a national park, botanical reserve, botanical garden, sanctuary or recreational park except—
(a) in terms of a written agreement between the Minister and the person concerned which has been approved by the President; or
(b) in accordance with any mining rights lawfully acquired in respect of the area of the national park, botanical reserve, botanical garden, sanctuary or recreational park before the date when such area became a national park, botanical reserve, botanical garden, sanctuary or recreational park.

(3) Notwithstanding this Act, a person prospecting or working any mining location in terms of subsection (1) or (2) may do any thing necessary for those purposes within the national park, botanical reserve, botanical garden, sanctuary or recreational park concerned, subject to the terms and conditions of the relevant permit or agreement or in accordance with the mining rights, as the case may be.

(4) Notwithstanding this Act, a person may pick any specially protected indigenous plant or indigenous plant where the picking is necessary for the working of any mining location and in accordance with the exercise of mining rights lawfully acquired in terms of the Mines and Minerals Act [Chapter 21:05].

(5) Any person who contravenes subsection (1) or (2) shall be guilty of an offence.

120 Expropriation of land for national parks, etc.

(1) Wherever it appears to the President that any land or an interest in or right over land is required for the purpose of protecting, establishing or extending a national park, botanical reserve, botanical garden, sanctuary, safari area or recreational park, it shall be lawful for the Minister, on the authority of the President, to acquire such land, interest or right.

Provided that the powers conferred by this subsection shall not include the power to acquire, whether compulsorily or by agreement, any Communal Land or any interest in or right over Communal Land, otherwise than in accordance with the Communal Land Act [Chapter 20:04].

(2) Parts III, V and VIII of the Land Acquisition Act [Chapter 20:10] shall apply, mutatis mutandis, to the exercise by the Minister of his rights in terms of subsection (1).

121 Dangerous animals

(1) The animals specified in the Ninth Schedule are hereby declared to be dangerous animals.

(2) The Minister may, by notice in a statutory instrument, amend the Ninth Schedule by—
(a) adding the name of any animal thereto; or
(b) removing the name of any animal therefrom.

122 Prescribed roads

(1) The roads specified in the Tenth Schedule are hereby declared to be prescribed roads.

(2) The Minister may, by notice in a statutory instrument, amend the Tenth Schedule by—
(a) adding any road thereto; or
(b) removing any road therefrom.

123 Authorities, permits and licences

(1) Any authority, permit or licence granted or issued by the Minister, a conservation committee or an appropriate authority in terms of this Act may be subject to such terms and conditions as the Minister, conservation committee or appropriate authority, as the case may be, may deem fit to impose.

(2) Every permit or licence issued in terms of this Act, other than—
(a) a permit to pick or sell any indigenous plant in terms of section fifty-six; or
(b) a permit to fish in terms of section eighty-six; shall be in writing.

(3) No authority, permit or licence granted or issued in terms of this Act may be transferred to any other person.

(4) The Minister, a conservation committee or an appropriate authority may at any time without assigning any reason therefore—
(a) refuse to grant or issue any authority, permit or licence in terms of this Act; or
(b) cancel or amend any authority, permit or licence granted or issued by him or it, as the case may be, in terms of this Act.

(5) If the Minister, a conservation committee or an appropriate authority cancels or amends any authority, permit or licence in terms of paragraph (b) of subsection
APPENDIX 2 – BUMBUSI NATIONAL MONUMENT

Mine 3 is being developed within a few kilometers of the Bumbusi Ruins which is a national monument. Below is an extract from the web site of the World Monuments Fund (www.wmf.org)

**BUMBUSI NATIONAL MONUMENT**

Matabeleland, Zimbabwe

WMF Program: 2008 Watch

The Bumbusi National Monument comprises the remains of colossal sandstone walls, boulders, platforms, and dwellings dating to the eighteenth and nineteenth centuries, as well as much older rock art. Declared a National Monument in Zimbabwe in 1946 because of its importance as a rare surviving monument of pre-colonial civilization, it also serves as a sacred site that remains an important spiritual center for the living descendents of the Bumbusi builders. Archaeological investigations in 2000 uncovered the ruins of the earthen floors of 18 homes, several with game boards set into them. Bumbusi is also part of the Great Zimbabwe tradition of meticulously planned and built monumental stone walls, most famously represented by the Great Enclosure of Great Zimbabwe, a World Heritage Site.

The National Museums and Monuments of Zimbabwe—the agency that oversees the country's heritage—owns the Bumbusi National Monument, but does not have sufficient funds to protect, maintain, or restore the site. The primary threats to the site include destruction of the walls by animals in the surrounding Hwange National Park. Elephants and buffalo push over walls, while baboons pick up and relocate stones from the structures. A fence is required to protect the site from the animals. Another major threat is the natural fragility of sandstone constructions, which degrade easily, a problem exacerbated by the lack of mortar. Watch listing should attract new attention to this and other cultural sites in southern Africa, which are not well known by the larger international community.

LAST UPDATE: 2008

World Monuments Fund
350 Fifth Avenue
Suite 2412
New York, NY 10118
Tel. 646-424-9594
wmf@wmf.org