



## Letter

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

Attention: Vaalbult Mining Company (Pty) Ltd  
P.O.Box 3890  
RIVONIA  
2128

### SAHRA Comments required on HIA Report for the Vaalbult Mining Project (Vaalbult 3IT), West of Carolina in Mpumalanga

*Rubidge, B. January 2014. PALAEOLOGICAL DESKTOP STUDY VAALBULT COLLIERY, ALBERT LUTHULI LOCAL MUNICIPALITY, MPUMALANGA PROVINCE*

The above report was submitted for the proposed development of 730ha of land for conventional strip-mining and trenching for coal. The proposed infrastructure for the mine includes a main office complex, mining sections with overburden stockpiles, storm water control measures and road infrastructure. According to the submitted EMPr, the coal seams are exposed at the surface as well as up to 40m below the surface. All of these coal seams will be mined.

In SAHRA's previous letter dated Tuesday 14 January 2014, SAHRA indicated that;

"According to the EMPr, the area proposed for mining is situated in the Vryheid Formation of the Ecca Group. This formation is rich in fossil plant assemblages of the Permian Glossopteris Flora (lycopods, rare ferns and horsetails, abundant glossopterids, cordaitaleans, conifers, ginkgoaleans), rare fossil wood, diverse palynomorphs and is abundant in low diversity trace fossils, rare insects, possible conchostracans, non-marine bivalves and fish scales. As such, the likelihood of the proposed development impacting on significant palaeontological heritage is high."

And as such, SAHRA required that;

"A field-based palaeontological assessment be completed prior to development in order to determine if any fossiliferous surface exposures will be impacted by the proposed mining activities. This assessment must include a protocol for finds as well as a system for the ongoing monitoring of the fossiliferous fine-grained partings of siltstone and mudstone between the coal layers, and in the sequences above and below the seams. This assessment must satisfy SAHRA's minimum requirements and must be submitted to SAHRA for comment in terms of Section 38(8) of the NHRA."

It is noted that the submitted Palaeontological Desktop Study does not satisfy SAHRA's requirements as previously communicated in that no field-based assessment was conducted and no protocol for finds and ongoing monitoring has been provided. As such, the requested information is still outstanding.

SAHRA is therefore unable to provide a Final Comment on the proposed development on Vaalbult Mine as insufficient information has been provided to SAHRA regarding the likelihood of impact to significant



palaeontological heritage. As such, SAHRA requires that;

- A field-based palaeontological assessment be completed prior to development in order to determine if any fossiliferous surface exposures will be impacted by the proposed mining activities. This assessment must include a protocol for finds as well as a system for the ongoing monitoring of the fossiliferous fine-grained partings of siltstone and mudstone between the coal layers, and in the sequences above and below the seams. This assessment must satisfy SAHRA's minimum requirements and must be submitted to SAHRA for comment in terms of Section 38(8) of the NHRA.
- The sites identified in the submitted heritage assessment must be conserved in situ and may not be impacted by the proposed development. A 20m buffer zone of no development is required around the identified resources. A Conservation Management Plan must be drafted for the continued management and conservation of these resources throughout the Life of the Mine.

SAHRA looks forward to receiving the required palaeontological report before commenting further.

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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Jenna Lavin  
Heritage Officer  
South African Heritage Resources Agency



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Colette Scheermeyer  
SAHRA Head Archaeologist  
South African Heritage Resources Agency

**ADMIN:**

Direct URL to case: <http://www.sahra.org.za/node/146754>

Edit view (, Ref: )

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CaseID: 4309

Date: Wednesday January 22, 2014

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an agency of the  
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