

Interim Comment

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

Pelser, A. February 2013. A Report on A Heritage Assessment for the Proposed Vaalbult Mining Project on portions of the farm Vaalbult 3IT, Gert Sibande District Municipality, West of Carolina, Mpumalanga Province. APAC013/07

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.

According to the above heritage report, large portions of the study area have been previously disturbed by agricultural activities. No Stone Age or Iron Age sites were identified in the study area in the report, however it is noted that extensive Iron Age archaeology has been identified in the vicinity of the proposed development. Four sites of heritage significance were identified in the report. It is noted that certain sections of the development area could not be accessed by the specialist due to agricultural activities.

Sites 1 and 4 describe single graves and Site 3 describes an informal farm workers burial ground consisting of approximately 5 burials. Site 2 describes a farmstead with outbuildings that is likely older than 60 years but has limited heritage significance. According to the EMPr, the identified heritage sites are situated in the west of the study area and fall outside of the area proposed for surface disturbance.

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.

Interim Comment

SAHRA is 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



Jenna Lavin
Heritage Officer
South African Heritage Resources Agency



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: Tuesday January 14, 2014

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