



# DIGBY WELLS

## ENVIRONMENTAL

26 September 2017

Nokukhanya Khumalo  
South African Heritage Resources Agency  
111 Harrington Street, Cape Town

### **CASE ID: 10852 – LEDJADJA BORROW PIT HBAR**

Dear Nokukhanya,

Thank you for the interim comments dated 18 September 2017. These have been forwarded to the applicant Ledjadja Coal (Pty) Ltd for consideration.

This letter serves as a motivation in support of a request for reconsideration of the interim comments issued on Case ID: 10852.

The interim comments stipulated the following:

*“Taking into consideration the response letter from Prof. M. Bamford, SAHRA APM Unit requests a field based Palaeontological Assessment to be conducted by a qualified palaeontologist, as the area is underlain by very high palaeontological sensitive rocks. A detailed fossil finds procedure must also be compiled and included in the assessment.*

*The report must be submitted to SAHRA for comment.”*

The issued requirements are in excess of those recommended by the specialist Prof. M. Bamford which clearly stated that the conclusions of the assessment were correct, notwithstanding the identified errors. Her recommendations further stipulated that the proposed Project can proceed on condition that the environmental officer / responsible person must monitor the excavations very closely, collect any fossiliferous material and send photographs to a palaeontologist for assessment. Considering the results of the palaeontological review completed and recommendations made, the undertaking of a new field-based study and assessment by a palaeontologist is considered to be excessive, and will result in undue additional expenditure and delays to the applicant. This is further compounded by the fact that SAHRA have previously approved and endorsed the Boikarabelo Coal Mine Chance Find Protocol.

I concede that the “responsible person” is not clearly defined, and the environmental officer may not be sufficiently qualified to complete the recommended palaeontological monitoring. This should be undertaken by a suitably qualified palaeontologist in respect earth moving activities.

To this effect, Digby Wells Environmental on behalf of Ledjadja Coal (Pty) Ltd request SAHRA to reconsider the requirement of undertaking of a new palaeontological field-based study considering the aforementioned motivation.

Digby Wells and Associates (South Africa) (Pty) Ltd. Co. Reg. No. 2010/008577/07. Turnberry Office Park, 48 Grosvenor Road, Bryanston, 2191. Private Bag X10046, Randburg, 2125, South Africa  
Tel: +27 11 789 9495, Fax: +27 11 069 6801, [info@digbywells.com](mailto:info@digbywells.com), [www.digbywells.com](http://www.digbywells.com)

Directors: GE Trusler (C.E.O), GB Beringer, LF Koeslag, J Leaver (Chairman)\*, NA Mehlomakulu\*, MJ Morifi\*, DJ Otto, RA Williams\*

\*Non-Executive



Your balanced consideration of the contents of this letter is greatly appreciated.

Regards,

Justin du Piesanie

*Manager: HRM*