



DIGBY WELLS

ENVIRONMENTAL

26 November 2014

Colette Scheermeyer

SAHRA

111 Harrington Street, Cape Town, 8000

WELTEVREDEN OPEN CAST COAL MINE (CASE ID 5472)

Dear Colette Scheermeyer,

Thank you for the Interim Comment issued for the *Weltevreden Open Cast Coal Mine* project (Case ID 5472). To enable Digby Wells and its client, Northern Coal (Pty) Ltd (Northern Coal), to comply with the requirements stipulated in the Interim Comment we kindly request clarity and advice on certain points.

1 Site s.34-001 – Historical Mine Shaft

The cultural significance (CS) of this site was determined to be low. However, the HIA report noted that it may be subject to induced and cumulative impacts that could result from blasting activities. The site will however not be destroyed through any mining or ancillary activities that will directly impact on it.

SAHRA required that the site be mitigated through detailed recording and mapping prior to any blasting occurs. Digby Wells is uncertain to what extent SAHRA require mapping. Based on the field observations made, there are no visible surface infrastructures, i.e. structures protected in terms of section 34 of the NHRA. Furthermore, the mine shaft is currently partly under water. Consequently, the site presents significant safety risks should SAHRA require detailed mapping and recording of the internal extent of the shaft. We therefore request SAHRA to advise on the most appropriate way forward.

2 Site s.34-002 – Historical house

This site is located at least one kilometre from the eastern boundary of the Weltevreden project. According to the blasting study referenced in the HIA report (Zeeman 2008) blasting will be perceivable but have negligible physical impact on this site. The Zeeman report (2008:15-17) further maintains that even possible impacts from air blast at maximum predicted values will be below the accepted threshold. There are therefore no predicted impacts on site s.34-002 that would require this site to be recorded and mapped.

In addition, the mitigation measures recommended in the Zeeman report will prevent any other physical impacts to occur, such as risk of fly rock.

Digby Wells kindly requests SAHRA to reconsider the need for mapping and recording of site s.34-002.

3 Site s.34-003 – Historical house

This site is well within the potential blasting and vibration study impact zones. Digby Wells agrees with SAHRA's requirements.

4 Sites s.36-006 and 007 – Burial grounds and graves

These sites are located on the northern perimeter of Pit 3 of the Weltevreden project. Based on the Weltevreden project Life of Mine schedule, Pit 3 may only occur after four years. However, Northern Coal has indicated that Pit 3 may not be developed at all.

Digby Wells agrees with SAHRA's requirements to either conserve these sites in situ, or relocate them if in situ conservation is not possible. However, Digby Wells feels it imperative to not create expectations among any next-of-kin or other stakeholders regarding grave relocation in pre-empting the development of Pit 3. We therefore recommend that consultation in terms of section 36 of the NHRA and Chapter XI of the NHRA Regulations only become required if and when the development of Pit 3 is considered viable.

5 Palaeontological Impact Assessment

We would like to draw your attention to the palaeontological component of the HIA report.

The Scope of Work completed for the HIA stated that a PIA was undertaken including a field assessment (Higgitt & Karodia Khan 2014: 2, 15). The field assessment was done by Ms Shahzaadee Karodia Khan. The palaeontological section of the HIA report referred to in the Interim Comment is a baseline description of the *expected* palaeontology in the local study area.

However, the palaeontologist reported the following:

A palaeontological survey was conducted on 25 June 2014. The aim of this survey was to identify and record possible palaeontological resources as well as to provide a first-hand record of the current state of the cultural landscape. The current cultural landscape is primarily agrarian comprising mainly of fields and grazing. A pan is located on the farm as well as a number of small dams. Outcropping is present around the dams and near river crossings. The project area is interspersed with a number of groves (stand of trees lacking dense undergrowth).

The palaeontological field survey was focused on the outcroppings, around the dams and river crossings, and in groves.

No palaeontological resources were identified in the project area however, operational activities particularly excavation of the pits are likely to expose and/or destroy, or seal in palaeontological resources that may be present in relevant geological strata. It is therefore

recommended that the fossil finds procedure be implemented during construction and operation of the project.

Should SAHRA accept the above discussion, Digby Wells will amend the HIA report to include this section and resubmit for final comment.

Regards,



Johan Nel

Manager: HRM unit