



an agency of the  
Department of Arts and Culture

T: +27 21 462 4502 | F: +27 21 462 4509 | E: info@sahra.org.za  
South African Heritage Resources Agency | 111 Harrington Street | Cape Town  
P.O. Box 4637 | Cape Town | 8001  
www.sahra.org.za

Enquiries: Ragna Redelstorff  
Tel: +27 (0)21 202 8651  
Email: rredelstorff@sahra.org.za  
CaseID: 11478

Date: Thursday December 21, 2017  
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## Interim Comment

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

Attention: Anker Coal and Mineral Holdings SA (Pty) Ltd

#### Heritage Impact Assessment in support of the Elandsfontein Colliery Section 102 Environmental Management Programme Amendment

Digby Wells Environmental (Pty) Ltd have been appointed by Anka Coal and Mineral Holdings (Pty) Ltd to undertake an Environmental Impact Assessment (EIA) process in terms of the National Environmental Management Act, 107 of 1998 (NEMA) and the NEMA Environmental Impact Assessment (EIA) 2014 Regulations, as amended. Their in-house heritage specialist has undertaken a Heritage Impact Assessment (HIA) to inform the heritage component of the EIA application. A HIA report inclusive of a palaeontological exemption letter have been submitted to SAHRA for comments in terms of the National Heritage Resources Act, no. 25 of 1999 (NHRA).

Anka Coal and Mineral Holdings is proposing to expand their mining operations on the Elandsfontein Mine, located on the farm Elandsfontein 309 JS, in the eMalahleni Local Municipality of Mpumalanga Province. The mine will be using rolling strip mining method and rehabilitating the open cast pit strips. Associated infrastructure will be the topsoil heaps, spoil heap and haul road.

SAHRA Archaeology, Palaeontology and Meteorites (APM) Unit had issued a comment dated 3/10/2017, which stated the following: "*SAHRA Archaeology, Palaeontology and Meteorites (APM) Unit cannot comment on this project as there is no assessment on the palaeontological heritage resources. A suitably qualified palaeontologist must be appointed to undertake a field based Palaeontological Impact Assessment and the report to be submitted to SAHRA, before further comments are issued. All the environmental documentation compiled for the amendment of the EMPr must be submitted to this case including all the appendices*". An exemption letter by Dr M. Bamford was submitted to the case on 23/10/2017 instead of a field based Palaeontological Impact Assessment (PIA) as requested in the 3/10/2017 Interim Comment.

## Interim Comment

The SAHRA Archaeology, Palaeontology and Meteorites does not accept the PIA exemption letter by Dr M. Bamford. As the Elandsfontein Colliery consists of underground (314MR) and open-pit sections (63MR), i.e. it

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is an existing operation, plenty palaeontological material may have already been exposed during previous mining activities. Therefore, a field-based PIA must be done by a professional palaeontologist to investigate this state and submitted to SAHRA. The PIA report must follow the Palaeontological minimum standards guideline document, 2012 and contain a geological map. The amended EMP as well as EIA including all appendices must also be submitted to the case.

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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Ragna Redelstorff  
Heritage Officer  
South African Heritage Resources Agency

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Phillip Hine  
Acting Manager: Archaeology, Palaeontology and Meteorites Unit  
South African Heritage Resources Agency

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**ADMIN:**  
Direct URL to case: <http://www.sahra.org.za/node/406598>  
(DMR, Ref: MP30/5/1/2/2/10132MR)