



an agency of the
Department of Arts and Culture

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CaseID: 10852

Date: Monday July 31, 2017
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Interim Comment

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

Attention: Ledjadja Coal (Pty) Ltd

P.O. Box 5384
Rietvalleirand
0174

Environmental Authorisation Process in support of the Ledjadja Coal Borrow Pits Mining Permit Applications

Ledjadja Coal (Pty) Ltd is proposing to mine aggregate sand from five borrow pits to supply construction sand for the approved Boikarabelo Mine infrastructure development plans (the railway line and road diversion). They will be located outside the existing Boikarabelo Coal Mine mine right area, on the farms Bitterfontein 272 LQ, Kamiesbult 291 LQ, Looplaagte 302 LQ; and Vlughtkraal 273 LQ in Lephalale Local Municipality of Limpopo Province. The total extents of the combined borrow pits will amount 20 hectares.

Digby Wells Environmental (Pty) Ltd have been appointed by Ledjadja Coal (Pty) Ltd to conduct an Basic Assessment process in support of an Environmental Authorisation and Mine Right, in terms of the National Environmental Management Act, 107 of 1998, as amended (NEMA) and section 22 of the Minerals and Petroleum Resources Development Act, 28 of 2002 (MPRDA), as amended. The assessment of heritage resources was conducted by their in house specialist and compiled into a Heritage Basic Assessment report with an assessment of palaeontological resources. The report has been submitted to SAHRA, in terms of section 38 (8) of the National Heritage Resources Act, 25 of 1999 (NHRA).

Du Piesanie, J. March 2017. Environmental Authorisation Process for the Establishment of Five Borrow Pits near Lephalale, Limpopo Province Heritage Basic Assessment Report.

The author undertook a field based assessment of the development area to determine whether potential heritage resources will be impacted by the proposed development. Four sites were identified during the field investigation, of which two of the sites (SA001 and SA002) are low density surface scatters of undiagnostic MSA stone tool flakes. One site (SA003) is a single isolated undiagnostic MSA stone flake and the fourth site (FC001) is a single isolated undiagnostic potsherd. Sites SA001; SA002 and FC001 will be directly impacts by borrow pit BP5 however, since the significance of these finds is low no further mitigation measures are recommended. Site SA003 will be directly impacted by borrow pit BRD 3 however, since the significance of



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these finds is low no further mitigation measures are recommended.

Additional sites which were first recorded by Witwatersrand archaeology department were found very close to some of the proposed borrow pit. The first site is (2327/RES901/009), a well preserved high density MSA stone tool site and is listed as being of medium cultural significance. The stone tool site is associated with a natural seep located within 100m of borrow pit BP 5. The other two sites with site numbers from the Witwatersrand archaeology database are 2327CA53; 2327CA54, which are MSA stone tool sites located just outside Borrow pit BRD 3. They will be indirectly impacted as they are less than 100m away from the borrow pit.

The author recommends that before the mining of borrow pit 5 on farm Bitterfontein 272 LQ, the site (2327/RES901/009) must be mitigated. A section 35 permit needs to be applied for, to SAHRA by an archaeologist on behalf of the applicant, before mitigation may proceed.

A palaeontological assessment was included within the Heritage Basic Assessment report (HBAR), the findings are that the geology of the study area is of the Wellington Formation (Dwyka Group) and the Swartrant Formation (Ecca Group). The rocks of the Wellington Formation consist of dark-grey mudstone and siltstone dominant on the farms Vlugtkraal, Kamiesbult and Bitterfontein. The Wellington Formation is listed having a low palaeontological sensitivity. The rocks of the Swartrant are dominant on the farm Looplaagte and consist of sandstone, siltstone, mudstone and coal seams. The Swartrant Formation is listed having a high palaeontological sensitivity.

The author recommends that the fossil chance finds procedure that was accepted for the Boikarabelo Mine EMPr.

The name of the palaeontologist who wrote/reviewed this section of the report is not mentioned.

Interim Comment

SAHRA Archaeology, Palaeontology and Meteorites (APM) agrees with the recommendations provided in the report but cannot accept it as there is no reference to a palaeontologist who reviewed the report, nor does the palaeontologist declare their independence from the project. SAHRA requires clarity on the authorship of the palaeontological section in the report.

All the documents compiled in support of an Environmental Authorisation and Mine Right application for this project needs to be uploaded to the case. Including the original Palaeontological assessment report compiled by the palaeontologist.

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SAHRA will process the case further once the information above is uploaded 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

Nokukhanya Khumalo
Heritage Officer
South African Heritage Resources Agency

John Gribble
Manager: Maritime and Underwater Cultural Heritage Unit / Acting Manager: Archaeology, Palaeontology and Meteorites Unit
South African Heritage Resources Agency

ADMIN:

Direct URL to case: <http://www.sahra.org.za/node/396894>
(, Ref:)