



Interim Comment

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

Attention: USIMBITHI MINING (PTY) LTD
PRIVATE BAG X1838
MIDDELBURG
1050

PROPOSED WONDERFONTEIN COLLIERY NEAR BELFAST IN THE MPUMALANGA PROVINCE OF SOUTH AFRICA

Miller, S. (March 2013). A phase 2 architectural documentation of two farmyards on the farm Wonderfontein 428 JS district Belfast, Mpumalanga Province.

Pelser, A. July 2013. A REVISION OF PHASE 1 HIA FOR THE PROPOSED WONDERFONTEIN COLLIERY NEAR BELFAST IN MPUMALANGA

The above revised report was submitted for a proposed new colliery on the Farms Wonderfontein 428, Grootpan 456 and Klippan 452, south west of Belfast in Mpumalanga. The proposed activity includes open-cast and underground coal mining. The Wonderfontein Colliery Project area covers pristine stretches of land as well as land previously used for agriculture. The proposed open cast mining will cover approximately 1320ha and the underground mining will cover 146ha.

The above second revised HIA was submitted to SAHRA for comment in terms of Section 38(8) of the National Heritage Resources Act (Act 25 of 1999) which states that that the consenting authority must ensure that the evaluation done for heritage as part of the EIA process fulfills the requirements of the relevant heritage resources authority.

Two structural heritage resources and a wagon shed were identified in the submitted second revised HIA, these are HH01 and HH02. The above report by Mr S. Miller (2013) provides a detailed description of the structural resources on the property and grades them as having local significance (Grade 3), but does not indicate whether these have high, medium or low local heritage significance. The architectural report also identifies a proposed cultural landscape due to the link between HH02 and GY08, a burial ground containing approximately 26 people dated to between 1920 and 1980. The second revised amended HIA indicates that both heritage resources HH02 and GY08 will be directly impacted by the proposed mining development.

Additional heritage resources identified in the second revised report that will be impacted by the proposed development include GY09, a burial ground containing approximately 60 individuals, the age of which was not stipulated in the report; GN1, a burial ground containing two individuals, the age of which was not stipulated in the report and GN5, a burial ground containing approximately 90 individuals and dated to between 1952 and 1988.

Despite previous requirements communicated by SAHRA, no GPS track paths were included in this report





Enquiries: Jenna Lavin
Tel: 021 462 4502
Email: jlavin@sahra.org.za
CaseID: 1487

Date: Monday July 15, 2013

Page No: 2

although these are required in terms of the SAHRA Minimum Standards. No assessment of impacts to Palaeontological or Archaeological Heritage was provided since the report does not indicate explicitly whether any of these resources were identified or not, restricting comment to two ambiguous sentences in the background discussion of regional heritage resources. While the above requirements may not have been included in the "brief" of the consultant, they remain requirements from SAHRA that have not yet been fulfilled.

It must also be noted that permits for exhumation of burials in terms of Section 36 and demolition of structures in terms of Section 34 are subject to the comments made in terms of Section 38(8) of the National Heritage Resources Act.

Interim Comment

As such, please note the following;

1. Information explicitly pertaining to the impact of the proposed mining development on archaeological and palaeontological resources is still outstanding
2. SAHRA has no objection to the exhumation of GN1 and GN5 subject to the appropriate permits being granted in terms of Section 36 of the National Heritage Resources Act. It is noted that most of the affected burials in GN5 are younger than 60 years and therefore fall outside of the jurisdiction of the NHRA.
3. The report regarding the cultural landscape is unclear and conflicting. The cultural landscape has not been sufficiently described to warrant destruction. As such, it is SAHRA's contention that the mine plan must be amended to ensure the protection of the heritage resources identified as HH02 and GY08.
4. SAHRA requires more information regarding the identified structures before being able to comment on their heritage significance. This additional information must be in the form of an assessment of the significance of the identified structures in their context, and must include adequate recordings of the structures.

This additional information is required before SAHRA can issue a Final Comment on this application.

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



Wonderfontein Colliery Project

Our Ref: 16/5/1 Wonderfontein Colliery Project

Enquiries: Jenna Lavin
Tel: 021 462 4502
Email: jlavin@sahra.org.za
CaseID: 1487

Date: Monday July 15, 2013

Page No: 3



Colette Scheermeyer
SAHRA Head Archaeologist
South African Heritage Resources Agency

ADMIN:

Direct URL to case: <http://www.sahra.org.za/node/109858>



The South African Heritage Resources Agency

Street Address: 111 Harrington Street, Cape Town 8000 * Postal Address: PO Box 4637, Cape Town 8000
* Tel: +27 21 462 4502 * Fax: +27 21 462 4509 * Web: <http://www.sahra.org.za>