



## Interim Comment

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

Attention: Msobo Coal  
50 Hoy Street  
Breyten  
2330

#### The Consbrey Colliery near Breyten, Mpumalanga

*Du Pisanie, J. et al. (June 2013). Heritage Impact Assessment for the Consbrey Colliery Project, 2629BB and 2629BD, Mpumalanga Province*

The above Heritage Impact Assessment for the Consbrey Colliery Project and associated letter requesting exemption from conducting an HIA for Consbrey A were received by SAHRA on 21 June 2013. The proposed development entails opencast and underground coal mining over 9146.7ha over 30 years to a depth of up to 180m.

No infrastructure designs were available at the time of writing the HIA which limits the assessment of impact of the proposed development on heritage resources. Depending on proposed dump and infrastructure heights, the proposed development may be highly visible from Breyton and surrounding farms, as well as from the N11, R36 as well as main and secondary roads traversing the area. However, a VIA has not yet been completed.

The HIA was also limited in that landowner permission was not granted for Farm Opgoendenhoop 205 IS portions 3 and 4 and as such, this portion of the property proposed for development was not subject to a foot survey. However it is likely that the majority of this area has been previously disturbed by agricultural activities.

A number of heritage resources were identified in the HIA that will be either directly or indirectly impacted by the proposed development, including a bridge, four historic farm werwe, five rock art sites, seven palaeontological finds as well as five burial grounds or graves.

Of these, the Boomplaats werf will be directly impacted by the mining as proposed, as it is situated within the boundary of a proposed open cast pit. This werf has some significance and has been given a proposed grade of 3C. One of the burial grounds identified is associated with this werf. The Bankfontein werf will also be directly impacted by the proposed open cast pits however, this farm werf has been identified as being less significant.

A number of rare fossil finds were identified within the project area, including four examples of the plant *Breytenia* of which currently, only one specimen is available for research. These rare fossil finds have been proposed as having Grade 1 significance. These fossils will be indirectly impacted by blasting and vibrations from the proposed development. As yet, however, the blasting and vibrations study has not been completed.

#### Comment:





SAHRA approves the submitted HIA, and based on the submitted information, requires the following;

1. The layout of the proposed open-cast mining pits must be amended to exclude the Boomplaats werf and associated burial ground
2. No further assessment is required in terms of the Bankfontein werf.
3. A Conservation Management Plan is required for all the heritage resources identified in the HIA that will remain in situ, including but not limited to the Boomplaats werf and cemetery, the identified rock art sites, the burial grounds and graves as well as the bridge and Bosmanskrans werf. This CMP must make provision for monitoring and reporting as well as mitigation against the impacts of vibrations and blasting on the heritage resources.
4. The remaining farm werwe and bridge identified in the HIA must not be impacted unless a permit is granted by the MPHRA in terms of Section 34 of the NHRA.
5. The identified fossil finds are highly significant and must be mitigated. A Phase II collection permit application must be made to SAHRA to complete this work in terms of Section 35 of the NHRA. This application must include an identified repository as well as the collection methodology.
6. The Fossil Finds Procedure included in the HIA must be adopted and included in the EMP for the proposed development as well as in the CMP required as per point 3.
7. The request for exemption from conducting a full HIA for Consbrey A is granted, however SAHRA requires further information on the palaeontological and rock art resources that may be impacted by the vibrations and blasting caused by the underground mining. As such, an HIA limited to the impacts of the proposed underground mining on rock art and palaeontological resources is required. This study should be informed by the results of the vibrations and blasting study.

Should it not be possible to adhere to the above conditions, the applicant must consult with SAHRA regarding the reasons for non-compliance. We look forward to hearing from you.

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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Jenna Lavin  
Heritage Officer  
South African Heritage Resources Agency



Our Ref: 9/2/222/9

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CaseID: 1722

Date: Thursday July 04, 2013

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Colette Scheermeyer  
SAHRA Head Archaeologist  
South African Heritage Resources Agency

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**ADMIN:**

Direct URL to case: <http://www.sahra.org.za/node/111259>

Edit view (DMR, Ref: MP30/5/1/1/2/10060MR) (DMR, Ref: MP30/5/1/1/2/10062MR)

**Terms & Conditions:**

1. This approval does not exonerate the applicant from obtaining local authority approval or any other necessary approval for proposed work.
2. If any heritage resources, including graves or human remains, are encountered they must be reported to SAHRA immediately.
3. SAHRA reserves the right to request additional information as required.



The South African Heritage Resources Agency

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