

Interim Comment

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

Attention: Cabanga Concepts

Postnet Suite 470

Private Bag X3

Northriding

2162

A Report on a Cultural Heritage Impact Assessment for the proposed Brakfontein 264 IR Colliery Extension, close to Delmas, Mpumalanga Province

Van Vollenhoven, A. January 2013. A Report on a Cultural Heritage Impact Assessment for the proposed Brakfontein 264 IR Colliery Extension, close to Delmas, Mpumalanga Province

Millstead, B. October 2013. DESKTOP PALAEOLOGICAL HERITAGE IMPACT ASSESSEMENT REPORT ON THE SITE OF THE PROPOSED BRAKFORTEIN COAL MINE TO BE LOCATED ON THE FARM BRAKFORTEIN 264 IR PORTIONS 16, 17, 22, 24, 25 AND 27, MPUMALANGA PROVINCE

The above HIA was submitted for the proposed extension of the existing Brakfontein Colliery on Portions 4, 16, 22, 24, 25, 28 and 29 of the Farm Brakfontein 264 IR near Delmas in Mpumalanga. No indication was provided in the report regarding the proposed layout or infrastructure for the proposed colliery extension it is therefore not possible to determine the impact that the proposed development will have on heritage resources.

A subsequent letter from Cabanga Concepts dated 24 October 2013 indicated that the proposed opencast mining will impact approximately 140ha on portions 22 and 25 of the Farm Brakfontein 264. An additional 85ha will be undermined on portion 16 of the same Farm. A coal washing plant is proposed, as well as a crushing and screening plant and sumps for the water. The wash plant and associated infrastructure will impact approximately 96ha. An additional 20ha will be disturbed by various associated infrastructure including a weigh bridge, a full workshop area, diesel storage, an explosives magazine, ablution facilities, administration facilities and a security hut. 8m Wide haul and access roads are proposed. The road positions have not been finalised, however existing roads will be used as much as possible.

The study area has been recently disturbed by agricultural activities and archaeological visibility was poor.

Two sites of heritage significance were identified in the report. Site 1 consists of approximately 25 graves dated to between 1950 and 1971. Site 2 consists of approximately 40 graves however no dates for this burial ground were provided, although the headstones do indicate the age of the graves. No direct impacts on these resources are anticipated by the proposed development.

A third cemetery site was not identified in the submitted HIA but was identified in the EMP. The site missed by the heritage specialist and was discovered during the soil survey. This site is likely to be impacted by the proposed co-disposal facility. SAHRA is concerned that this site was not identified in the submitted HIA, especially considering that the track paths provided to SAHRA coincide with the location of this third cemetery

site. According to the HIA, during the survey, the under footing was very slippery due to rains that had fallen the previous day. This made it difficult to access certain fields. It is likely that this is the reason why the third cemetery was not identified in the HIA. However, SAHRA would suggest that the archaeologist wait for better weather conditions to undertake field assessments in the future as the quality of this field survey has suffered as a result.

According to the letter from Cabanga Concepts, the graves identified in the HIA (Site 1 and Site 2) are excluded from the mine plan and will not be disturbed however this is not made clear in the EMP. No recommendations have been made with regard to the third identified site.

According to the submitted PIA, the project area is completely underlain by sediments of the Vryheid Formation, but it appears that there may also be ubiquitous cover of regolith. The Vryheid Formation is fossiliferous elsewhere in the Karoo Basin. Well-preserved, coal-associated floras are generally restricted to the fine-grained partings of siltstone and mudstone between the coal layers. These plant macro-fossils and trace fossils are potentially significant.

The fossil potential of the regolith within the proposed project area is uncertain, however, the likelihood of impact to significant palaeontology in these deposits is low due to extensive ploughing in the past.

It is noted that the proposed development area has not yet been mapped on SAHRIS.

Interim Comment

SAHRA is unable to issue a Final Comment and requires additional information. As such, please provide the following information;

- An updated HIA that assesses impacts to all heritage resources, including the newly identified third cemetery.
- A thorough site investigation of the outcrops of the area to be mined by a suitably qualified palaeontologist is required prior to the commencement of mining. This site investigation must identify palaeontological resources that may be impacted by the proposed development and must provide mitigation measures to limit negative impact. A report on this site investigation must be submitted to SAHRA for comment.
- The details regarding the management of the identified heritage in the EMP must be substantiated with a Conservation Management Plan for the identified graves in order to ensure their conservation into the future. The proposed management guidelines in the EMP are insufficient. A copy of this CMP must be submitted to SAHRA.

SAHRA looks forward to receiving this information.

Should you have any further queries, please contact the designated official using the case number quoted above in the case header.

Yours faithfully

Brakfontein Colliery Extension

Our Ref: 16/5/1 Brakfontein Colliery Extension

Enquiries: Jenna Lavin
Edit view Tel: 021 462 4502
Edit view Email: jlavin@sahra.org.za
CaseID: 2888

Date: Wednesday November 06, 2013

Page No: 3



an agency of the
Department of Arts and Culture

Jenna Lavin
Heritage Officer
South African Heritage Resources Agency

Colette Scheermeyer
SAHRA Head Archaeologist
South African Heritage Resources Agency

ADMIN:

Direct URL to case: <http://www.sahra.org.za/node/124150>



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>