



Interim Comment

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

Attention: Strategic Environmental Focus (Pty) Ltd
Po Box 74785
Lynnwood Ridge
0040

Proposed underground coal mine within the Paardekop prospecting right area, Mpumalanga

Seliane, M. (June 2013). *Paardekop Coal Mine: Phase 1 Cultural Heritage Impact Assessment*.

The above HIA and associated draft EIR were submitted to SAHRA for comment in terms of Section 38(8) of the National Heritage Resources Act. The draft EIR indicates that the commenting period for this phase of the proposed development is from 24 June to 5 August 2013. It is noted that the above documentation was only submitted to SAHRA on 2 August 2013.

The project entails the proposed development of the Paardekop Underground coal mine with a footprint of approximately 600ha and the development of associated railway infrastructure with a footprint of 110ha. The above HIA assesses the impacts on heritage resources that may result from the proposed erection of mine and railway infrastructure. This infrastructure includes mine buildings and yards, shafts, electrical facilities, explosives stores, roads, a railway line, construction camps, an underground services workshop and yard, underground storage units and a ventilation workshop.

The area proposed for development is largely rural and is characterised by large stock and crop farms.

The HIA identified 8 grave sites containing a total of 170 graves and 8 structures that may or may not be older than 60 years in the vicinity of the proposed development. Of the identified grave sites, only Grave Sites 7 is likely to be directly impacted by the proposed development. The ages of these 10 graves are not known. Of the identified structures, Structures A, B and H fall within the proposed development footprint. All of these structures were given a proposed grading of 3C indicating low heritage significance.

It is noted that the submitted HIA does not contain track paths and as such, does not comply with SAHRA's Minimum Standards for Impact Assessments. Nor does the HIA assess possible impacts to palaeontological heritage resources. According to the submitted draft EIR, the area proposed for development is underlain by the Vryheid and Volksrust Formations of the Ecca Group which is known for its non-marine trace fossils, vascular plants (including petrified wood) and palynomorphs of *Glossopteris* flora, mesosaurid reptiles, fish (including microvertebrate remains, coprolites), crustaceans, sparse marine shelly invertebrates (molluscs, brachiopods), microfossils (radiolarians *etc*) and insects.

Interim Comment:

SAHRA is unable to issue a final comment on the proposed development due to the limited information provided in the HIA. As such, SAHRA requires the following;





1. A Desktop Palaeontological Assessment is required that will assess the likelihood of the proposed development impacting on significant palaeontological heritage resources. This must be completed by a suitably qualified professional.
2. None of the Grave Sites identified in the HIA may be disturbed in any way. As such, the proposed layout of the development must be amended to avoid impacting on Grave Site 7 as per the mitigation measures outlined in the HIA.
3. Any alteration or demolition of any of the structures identified in the HIA can only occur once a permit in terms of Section 34 of the NHRA from the Mpumalanga Provincial Heritage Authority (MPHRA) has been issued.

Please can you ensure that SAHRA receives the relevant documentation such that SAHRA can issue a Final Comment on this application. This should be done via SAHRIS, the online heritage management system, at www.sahra.org.za.

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

Jenna Lavin
Heritage Officer
South African Heritage Resources Agency

Colette Scheermeyer
SAHRA Head Archaeologist
South African Heritage Resources Agency



Xstrata Paardekop Underground Coal Mine

Our Ref: 16/5/1 Xstrata Paardekop Mine

Enquiries: Jenna Lavin
Tel: 021 462 4502
Email: jlavin@sahra.org.za
CaseID: 3135

Date: Thursday August 15, 2013

Page No: 3



ADMIN:

Direct URL to case: <http://www.sahra.org.za/node/126513>



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>