



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 Amersfoort prospecting area, Mpumalanga

Seliane, M. (June 2013). *Xstrata Amersfoort 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 Amersfoort Underground coal mine with a footprint of approximately 117ha. The above HIA assesses the impacts on heritage resources that may result from the proposed erection of mine infrastructure. This infrastructure includes mine buildings and yards, shafts, electrical facilities, explosives stores, roads, a conveyor belt, 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 11 grave sites containing a total of 124 graves, 10 ruined structures that may or may not be older than 60 years and an old farm settlement in the vicinity of the proposed development. Of the identified grave sites, Grave Sites 1, 5 and 8 are likely to be directly impacted by the proposed development. The ages of these 56 graves are not known. None of the identified structures was identified as having any heritage significance and no structures will be directly impacted by the proposed development.

The old farm settlement is located within the area proposed for the new crushing plant. Very little background information was provided in the HIA regarding the old farm settlement. The settlement consists of ruins of kraals and houses and covers an extensive area.

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 Formation 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.

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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. Further desktop study is required on the "old farm settlement" identified in the report to determine its age and historical role. Based on the outcome of this study, SAHRA will determine what further steps must be taken in terms of mitigation strategies.
3. 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 Sites 1, 5 and 8 as per the mitigation measures outlined in the HIA.
4. 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



Xstrata Amersfoort Mine

Our Ref: 16/5/1 Xstrata Amersfoort Mine

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CaseID: 3138

Date: Thursday August 15, 2013

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Colette Scheermeyer
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South African Heritage Resources Agency

ADMIN:

Direct URL to case: <http://www.sahra.org.za/node/126524>



The South African Heritage Resources Agency

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