

## Interim Comment

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

Attention: WSP Environmental Pty Ltd - Johannesburg

Bryanston Place  
199 Bryanston Drive  
Bryanston  
2191

### **Proposed development of the Yzermyn Underground Coal Mine, close to the town of Wakkerstroom, Mpumalanga Province**

Van Vollenhoven, AC. April 2012. *A Report On A Pre- Feasibility Heritage Study For The Proposed Yzermyn Coal Mine Close To Dirkiesdorp, Mpumalanga Province.*

Pelser, A. February 2014. *A REPORT ON AN ADDITIONAL PHASE 1 HIA FOR THE PROPOSED YZERMYNE UNDERGROUND COAL MINE NEAR DIRKIESDORP, PIXLE KA SEME LOCAL MUNICIPALITY MPUMALANGA PROVINCE*

Thank you for submitting the above "Additional Phase 1" heritage study dated February 2014 to SAHRA for comment. It is noted that SAHRA has previously commented on this proposed development in a letter dated 14 February 2013 and 19 November 2013 in response to the heritage report dated April 2012 and additional information was requested. It is noted that this additional information has not yet been provided.

In terms of the National Heritage Resources Act, no 25 of 1999, heritage resources, including archaeological or palaeontological sites over 100 years old, graves older than 60 years, structures older than 60 years are protected. They may not be disturbed without a permit from the relevant heritage resources authority. Before such sites are disturbed by development, or mining, it is incumbent on the developer to ensure that a Heritage Impact Assessment is done in terms of Section 38(8) of the NHRA. This report must assess the impact of the proposed development on heritage resources and must provide possible mitigation measures, which may involve recording, sampling and dating sites that are to be destroyed.

The HIA dated February 2014 indicates in the introduction that it is supplementary to the pre-feasibility heritage study conducted in April 2012. The 2014 assessment concerns only the proposed Mine Discard Dump and does not repeat the work done in the April 2012 assessment. The 2014 report identifies 8 archaeological sites in the vicinity of the proposed discard dump including 2 packed stone graves and the stone remains of historical farming activities.

It is noted that the 2014 report does not indicate with any certainty if these identified resources will be impacted by the proposed development of the Mine Discard Dump. In addition, it is noted that the map of the study area provided on page 22 of the 2014 report does not correspond with the maps of the proposed coal mine provided to SAHRA in the Draft ESIA and ESMP. It is therefore unclear how this study is related to the case application submitted to SAHRA.



As the 2014 report deals only with the proposed Mine Discard Dump, SAHRA's requirements as communicated in our letters dated 14 February 2013 and 19 November 2013 still stand. Considering that the study submitted to SAHRA dated April 2012 is merely a pre-feasibility study and the layout of the mine is yet to be finalised, SAHRA APM Unit recommends:

- 1) Once the layout of the mine has been decided, it be subject to an intensive heritage survey and an Phase 1 Archaeological Impact Assessment be submitted to SAHRA APM Unit for review, that assesses the impact of the proposed mine development on the resources identified as having medium and high archaeological significance.
- 2) The larger project area must be subject to a Phase 1 Palaeontological Impact Assessment by a professional palaeontologist. This must be submitted to SAHRA for assessment.
- 3) The cemeteries, Sites 9 and 16, must be retained in situ and the mine layout must take cognisance of this recommendation. Subject to the re-assessment identified above, a Conservation Management Plan may need to be drafted for these resources.
- 4) The rock art site is deemed to be highly significant since little is known about the Later Stone Age of the area. It is therefore recommended that the site be conserved and no impact should occur on the area. Subject to the re-assessment identified above, a Conservation Management Plan may need to be drafted for this resource.

## Interim Comment

As such, SAHRA is unable to make a Final Comment as additional information is required. SAHRA therefore requires that;

- Once the layout of the mine has been decided, it be subject to an intensive heritage survey and an Phase 1 Archaeological Impact Assessment be submitted to SAHRA APM Unit for review, that assesses the impact of the proposed mine development on the resources identified as having medium and high archaeological significance. This assessment must include a map of all known heritage resources in relation to the areas proposed for development and mining including proposed roads.
- The larger project area must be subject to a Phase 1 Palaeontological Impact Assessment by a professional palaeontologist. This must include a field assessment for palaeontological resources and must include a programme for monitoring by a palaeontologist. This report must be submitted to SAHRA for assessment.
- The cemeteries, Sites 9 and 16, identified in the report dated April 2012 and Site 2 identified in the report dated February 2014, must be retained *in situ* and the mine layout must take cognisance of this recommendation. Subject to the re-assessment identified above, a Conservation Management Plan may need to be drafted for these resources.



# THE PROPOSED YZERMYN UNDERGROUND COAL MINE

Our Ref: 9/2/222/0002

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CaseID: 4024

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an agency of the  
Department of Arts and Culture

- The rock art site identified in the April 2012 report is deemed to be highly significant since little is known about the Later Stone Age of the area. It is therefore recommended that the site be conserved and no impact should occur on the area. Subject to the re-assessment identified above, a Conservation Management Plan may need to be drafted for this resource.

SAHRA looks forward to receiving the above requested information before commenting further.

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

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## ADMIN:

Direct URL to case: <http://www.sahra.org.za/node/138211>  
Edit view (DMR, Ref: MP 30/5/1/2/2/10069 MR) (DEA, Ref: 14/12/16/3/3/3/85)

## 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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