



Interim Comment

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

Attention: Shangoni Management Services
P.O. Box 74726
Lynwood Ridge
0040

Ngululu Resources (Pty) Ltd Environmental Management Programme for Portions 26 46 & 47 of the Farm Droogfontein 242 IR, Delmas, Mpumalanga Province

Pelser, A. October 2013. *REPORT ON A PHASE 1 HIA FOR A PROPOSED COAL MINE ON PORTIONS 26, 46 & 47 OF THE FARM DROOGENFONTEIN 242IR, DELMAS DISTRICT, MPUMALANGA*

Pelser, A. April 2014. *UPDATED REPORT ON A PHASE 1 HIA FOR A PROPOSED COAL MINE ON PORTIONS 26, 46 & 47 OF THE FARM DROOGENFONTEIN 242IR, DELMAS DISTRICT, MPUMALANGA*

Fourie, H. May 2014. *Palaeontological Impact Assessment: Phase 1 Field study for Ngululu Resources opencast coal mine, Nkangala District Municipality, Mpumalanga Province Farm: Portion 26, 46 and 47 Droogfontein 242 IR.*

The above report was submitted for the proposed development of an opencast coal mine over approximately 138ha. The mine will require the development of additional infrastructure including internal access roads, a pollution control dam, a crusher, a waste rock dump, diesel and oil storage, a workshop, administrative buildings, a septic tank system, a substation, a coal stockyard, a change house and a weigh bridge. The proposed mine is situated on land that has been used for agricultural purposes in the past.

According to the submitted heritage study, no sites of archaeological or historical significance were identified in the area proposed for development. An informal cemetery consisting of approximately 80 graves dated from 1963 to 1988 was identified in the north east corner of portion 26. In addition, the remnants of mud-brick and plaster structures were identified in portion 26. The remains of these structures have low heritage significance.

The revised HIA submitted to SAHRA contains the relevant track paths and includes an amended methodology section as requested in SAHRA's letter dated 10 February 2014.

According to the submitted palaeontological field assessment, the likelihood of the proposed mining impacting on significant palaeontological heritage is high. It is noted that in our previous letter, SAHRA required that the palaeontological field assessment "*must include a protocol for finds as well as a system for the ongoing monitoring of the fossiliferous fine-grained partings of siltstone and mudstone between the coal layers, and in the sequences above and below the seams.*" The submitted palaeontological assessment does not include this information.

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SAHRA is unable to provide a Final Comment on the proposed development as insufficient information has been provided to SAHRA regarding the likelihood of impact to significant palaeontological heritage. As such, SAHRA requires that;

- A protocol for palaeontological finds as well as a system for the ongoing monitoring of the fossiliferous fine-grained partings of siltstone and mudstone between the coal layers, and in the sequences above and below the seams must be submitted to SAHRA as soon as possible.
- SAHRA endorses the measures mitigating impact to the identified cemetery, however it is noted that any impact to the cemetery must be dealt with in terms of the Human Tissues Act of 1983 no. 65 and any relevant local ordinances.

SAHRA looks forward to receiving this 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



Jenna Lavin
Heritage Officer
South African Heritage Resources Agency

ADMIN:

Direct URL to case: <http://www.sahra.org.za/node/153504>
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