



Interim Comment

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

Attention: Mashala Resources (Pty) Ltd

The proposed project is an open cast and underground coal mine and will comprise of bord and pillar underground mining with a small area of rollover open cast mining at the adit. The application area is approximately 1 291 hectares in extent and falls within the jurisdiction of the Mkhondo Local Municipality in the Gert Sibande District Municipality of Mpumalanga. The proposed project is situated on Portion RE of the farm Leiden 340 IT, South of Sheepmoor, between Ermelo and Piet Retief, Mpumalanga.

Birkholtz, P. October 2013. *MASHALA RESOURCES: LEIDEN COLLIERY PROJECT, HERITAGE STUDY: SCOPING LEVEL REPORT*

Groenewald, G. October 2013. *PALAEONTOLOGICAL DESKTOP ASSESSMENT FOR THE LEIDEN COLLIERY ON THE REMAINDER OF THE FARM LEIDEN 340 IT, MKHONDO LOCAL MUNICIPALITY, GERT SIBANDE DISTRICT MUNICIPALITY, MPUMALANGA PROVINCE*

Thank you for informing SAHRA of the proposed development of an opencast and underground coal mine over approximately 1291ha on Portion RE of the farm Leiden 340 IT, South of Sheepmoor, between Ermelo and Piet Retief, Mpumalanga.

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.

According to the submitted scoping heritage assessment, a variety of heritage resources exist within the area proposed for development. These heritage resources include approximately six cemeteries, two farmsteads and one historical engraving of some significance. At this scoping stage, it is unclear which of these resources are likely to be impacted by the proposed development and how these impacts will be mitigated.



According to the submitted palaeontological report, the area proposed for development is predominantly underlain by sediments of the Vryheid Formation of the Ecca Group. This formation is known to have high palaeontological sensitivity as rich fossil plant assemblages of the Permian Glossopteris Flora (lycopods, rare ferns and horsetails, abundant glossopterids, cordaitaleans, conifers, ginkgoaleans), rare fossil wood and diverse palynomorphs have previously been identified from this formation. In addition, abundant, low diversity trace fossils, rare insects, possible conchostracans, non-marine bivalves and fish scales have also been identified. It is noted that coal is formed in taphonomic contexts conducive to the preservation of fossils floras. Well preserved, coal-associated floras are generally restricted to the fine-grained partings of siltstone and mudstone between the coal layers, and in the sequences above and below the seams. In the mining of coal resources, these otherwise rare fossil floras are exposed.

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SAHRA thanks you for the submission of the above Scoping Reports and looks forward to receiving the Impact Assessment reports for Final Comment. Please ensure that the Final Reports include the following information;

- A map of the identified heritage resources relative to the areas proposed for development
- The significance of the identified heritage resources
- Appropriate mitigation measures for instances whereby heritage resources will be impacted by the proposed mining
- As the proposed mine is situated within an area of high palaeontological sensitivity, SAHRA requires that a protocol for fossil finds be drafted to include examples of the kinds of fossils likely to be impacted as well as a process for protecting these fossils.
- One site inspection should be done by a suitably qualified palaeontologist during preliminary excavations, once mining has commenced and overburden has been removed. At this stage, the partings (the layers of siltstone and mudrock between the coal seams) are visible for inspection for significant fossil material.
- Should the site yield significant palaeo-botanical specimens, further site inspections must be arranged between the on-site geologist and the palaeontologist.

The final heritage impact assessment reports must satisfy SAHRA's minimum requirements for impact assessments and must comply with the requirements in Section 38(3) of the NHRA and as such, this assessment must provide recommendations regarding the mitigation of any identified direct and indirect impacts to heritage resources.

SAHRA looks forward to receiving these assessments before commenting further on this proposed



Our Ref: 16/5/1 Leiden Coal Mine

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CaseID: 5489

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Page No: 3

an agency of the
Department of Arts and Culture

development.

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/162750>

Edit view (, Ref: 30/5/1/1/2/10091 MR) (MDEDET, Ref: 17/2/3 GS-242) (DEA, Ref: 14/12/16/3/3/3/105)



The South African Heritage Resources Agency

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