

Final Comment

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

Attention: Ms Kelly Nesbitt
Environmental Impact Management Services (Pty) Ltd
Edit view P O Box 2083
Pinegowrie
2123

The proposed Paardeplaats project entails the development of a new coal mine located directly south of the existing Exxaro owned Glisa coal mine in Mpumalanga. The proposed mining right application area is approximately 1,415 Hectares and is located on the Farm Paardeplaats 380 JT (portions 13,28,29,30 & 40) and the Farm Paardeplaats 425 JS (portion 2 & Remaining Extent), approximately 4Km south west of the town of Belfast in the Mpumalanga Province

Kitto, J. October 2012. *Exxaro Paardeplaats Project: Heritage Impact Assessment Report*

Prevec, R. July 2012. *Exxaro Paardeplaats Palaeontological Scoping Report: Desktop level*

Thank you for informing SAHRA of the proposed development of a new coal mine located directly south of the existing Exxaro owned Glisa coal mine in Mpumalanga. The new coal mine is intended to use Glisa mine's approved and existing Mineral Processing Infrastructure. Development associated with the new coal mine will include open pits, pollution control dams, haul roads, pipelines, stockpiles, diesel storage, office and ablution facilities and general waste storage. The mining right area covers approximately 1415ha.

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 HIA, the area proposed for mining was assessed and numerous heritage resources were identified including significant structures and ruins, industrial archaeological heritage in the form of abandoned mine shafts and formal and informal burial grounds. In addition, the HIA identified heritage resources outside of the proposed mining area that may be impacted by blasting activity.

According to the submitted PIA, the proposed mine will impact the Vryheid Formation. This formation has very high palaeontological significance for its 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. It is also known for its abundant, low diversity trace fossils, rare insects, possible conchostracans, non-marine bivalves and fish scales.

Three mining alternatives are proposed including the 'No-Go Alternative', the 'Sensitivity Approach Alternative' and the 'Maximum Mine Production Alternative'. The 'Sensitivity Approach Alternative' will result in the least impact to heritage resources and is therefore SAHRA's preferred alternative.

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Based on the available information, SAHRA has no objection to the proposed mining on condition that;

- The 'Sensitivity Approach Alternative' proceeds
- Any formal or informal burial grounds on the property are left *in situ* and fenced with a 20m no-go buffer zone, these include Sites PP002, PP003, PP004, PP005, PP010, PP016, PP028 and PP031. A Conservation Management Plan must be incorporated into the EMP to ensure the effective management of these sites into the future. If any of these formal or informal burial grounds cannot be avoided by the mining activities, a permit for their formal exhumation must be applied for with the SAHRA Burial Grounds and Graves Unit in terms of Section 36 of the NHRA. This process requires extensive community consultation.
- The burials located within 3.5km from the epicentre of the proposed mine, need to be monitored regularly to assess possible damage from the mining.
- The ruins of unused structures older than 100 years identified in the report have limited archaeological significance and no further mitigation for these sites is required. These include Sites PP008, PP009, PP018, PP019, PP020, PP023, PP024, PP025 and PP027. Please note, however, that unmarked infant burials are often associated with ruins of mudbrick homesteads and must be monitored for at Sites PP015, PP016, PP021, PP022, PP026, PP029 and PP032.
- The industrial archaeological resources identified as Sites PP012, PP013 and PP017 should be left *in situ* with a buffer zone of 20m. These sites provide an opportunity to learn more about South Africa's mining heritage, and in turn provide an educational tool.
- The possible rock art at Site PP014 is investigated by a specialist if the area is going to be impacted by the mining. SAHRA is unable to determine how to proceed with this resource as insufficient information has been provided. If no rock art is identified, no further mitigation is required.
- Due to the likely impact to significant palaeontological heritage, the mine must establish a monitoring schedule with a palaeontologist for the regular inspection of activities.
- Any impact to recently occupied structures older than 60 years requires a permit from the Mpumalanga Provincial Heritage Resources Authority (MPHRA) in terms of Section 34 of the NHRA.
- If any evidence of archaeological sites or remains (e.g., remnants of stone-made structures, indigenous ceramics, bones, stone artefacts, ostrich eggshell fragments, marine shell and charcoal/ash concentrations), unmarked human burials, fossils or other categories of heritage resources are found during the proposed activities, SAHRA APM Unit (Jenna Lavin/Colette Scheermeyer 021 462 4502) must be alerted immediately, and a professional archaeologist or palaeontologist, depending on the nature of the finds, must be contacted as soon as possible to inspect the findings. If the newly discovered heritage resources prove to be of archaeological or palaeontological significance a Phase 2 rescue operation might be necessary.



Proposed Paardeplaats Coal Mine

Our Ref: 16/5/1 Paardeplaats Coal Mine

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CaseID: 5699

Date: Thursday June 05, 2014

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an agency of the
Department of Arts and Culture

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/164358>

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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