



an agency of the
Department of Arts and Culture

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CaseID: 9647

Date: Wednesday January 11, 2017

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Interim Comment

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

Attention: Ms Chantelle Gerber

Anglo Operations Proprietary Limited

Private Bag X1 Marshalltown Johannesburg

2107

Elders Colliery is a proposed underground mine for Anglo Operations (Pty) Limited. The project is located approximately 25 km north of Bethal. Coal will be mined by means of the bord and pillar mining method. Coal will be transported via a new overland conveyor system to the existing Goedehoop Colliery where the coal will be processed.

Thank you for submitting the Van Schalkwyk (2012) Heritage Impact Assessment report to the case on SAHRIS as requested in the SAHRA Interim Comment dated 16/08/2012. In addition, SLK Consulting has appointed Prof M. Bamford on behalf of their client, Anglo Operations (Pty) Ltd to conduct a Palaeontological Desktop Assessment also requested in the Interim Comment.

Van Schalkwyk, J. December 2012. Basic Assessment for the proposed updated Elders Underground Projects, Mpumalanga Province: Heritage Sites.

The author conducted a field assessment of the Elders Colliery mine right area, various archaeological sites and historical houses were identified. It is not clear whether sites were identified within the mine right area because the report does not describe the sites individually. Instead a map with dots that represents sites found is provided, with no track paths on the map to indicate that a field survey was conducted. It is not clear where the various farmsteads and homesteads were identified, and there is no indication that stonewalled sites are located in the mine right area. This report is titled as a basic assessment implying that no Heritage Impact Assessment was conducted for the Elders Colliery mine right area.

Van Schalkwyk, J. October 2015. Cultural Heritage Assessment for the updated Elders Mine Above Ground Project Areas, Mpumalanga Province.

This report was briefly discussed in the Interim Comment issued for this development. The report says no heritage sites occur within the mine right area however, the maps provided in the report do not show track paths taken for the survey, and they do not overlay the heritage sites identified in the Heritage Basic Assessment report for the mine right area. As such it is not clear whether a field survey of the mine shaft



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complex and all related proposed mine developments was conducted. The report states that it should be read in conjunction with the 2006 and 2012 heritage reports however both reports are not an impact assessment report as outlined in the SAHRA minimum standards report. Although the area was re-surveyed, there is no detailed description of the heritage sites that are briefly mentioned.

Bamford, M. September 2016. Palaeontological Impact Assessment for proposed Elders Colliery near Bethal, Mpumalanga Province.

The author reviewed various literatures concerning the geology of the area surrounding the town of Bethal. The study area is underlain by Permian aged shale, sandstone and coal seams of the Vryheid Formation, Eccca Group, Karoo Supergroup. The topmost No.6 coal seam lies 30m below ground level and the associated surface infrastructure will not impact on fossiliferous sandstone and shale interbedded with the coal seams. The author recommends a monitoring programme carried out by the mine geologist, who will be given photographs of local fossils by a palaeontologist, to aid in identifying fossils during mining operations. The mine geologist should inspect all shale and sandstone rocks mined out for fossilised glossopteris flora, before they are taken to the waste rock dump. The results of the inspections should be written up in a report to be submitted to SAHRA. If any fossils are uncovered, SAHRA must be informed and a palaeontologist contacted to inspect the finds. If they prove to be significant then with a section 35 permit from SAHRA, the palaeontologist will mitigate the fossils and send them to a recognised repository.

Interim Comment

SAHRA Archaeology, Palaeontology and Meteorites (APM) Unit agree with the recommendations provided in the Palaeontological Desktop Assessment including the monitoring procedures. All the monitoring procedures in the report must be included in the EMP for monitoring. The following additional procedures should be included in the EMP:

- A suitably qualified palaeontologist should be appointed to conduct a biannual assessment of the waste rock dump and the reports compiled by the mine geologist to determine the frequency and significance of the fossils being mined out as part of the mines operations. The biannual assessment should be for 3 years after mining of the coal seams begin, from there SAHRA can determine whether the assessments may continue based on the palaeontologists recommendations.

However no Heritage Impact Assessment was conducted for the proposed mine right area, as the two heritage studies submitted to the case do not provide a detailed impact assessment of the proposed mine construction and mining activities on the heritage resources located within the mine right area. The Heritage report conducted in 2006 is out of date and will not speak to the current proposed construction activities for the mine therefore SAHRA will not accept that report.



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SAHRA requires for a detailed Heritage Impact Assessment to be conducted for the proposed Elders Colliery Mine Right Area, following SAHRA minimum standards for Heritage Impact Assessments.

- The report should contain a map indicating the survey tack log, overlaid by the heritage sites identified in the mine right area as well as the proposed mine shaft complex, the proposed mini open cast pit, the conveyor belt and other facilities to be constructed by the Anglo.
- The report should describe the significance of each site identified, provide photographs of the site and mention the distance of the site to the proposed mine activities.
- The report should also contain a detailed impact assessment including the impact assessment table required by the EAP.
- The report should provide detailed recommendations for the prolonged conservation of the sites identified in the 2012 Heritage Basic Assessment report in addition to any other sites found in the mine right area, or outside that may be directly or indirectly affected by the proposed mine.

All EIA appendices should be uploaded to the case along with the HIA report before SAHRA can comment further on this case.

Should you have any further queries, please contact the designated official using the case number quoted above in the case header.

Yours faithfully

Nokukhanya Khumalo
Heritage Officer
South African Heritage Resources Agency

John Gribble
Manager: Maritime and Underwater Cultural Heritage Unit / Acting Manager: Archaeology, Palaeontology and



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Meteorites Unit
South African Heritage Resources Agency

ADMIN:

Direct URL to case: <http://www.sahra.org.za/node/364027>
(DMR-MP, Ref: MP 30/5/1/1/3/2/1 (10117) EM)