DWE_XST1716_ZANDBAKEN COAL MINE PROJECT

Our Ref: 9/2/271/0001

Enquiries: Phillip Hine Tel: 021 462 4502

Email: phine@sahra.org.za

CaseID: 846

Date: Wednesday November 28, 2012

Page No: 1



Interim Comment

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

Attention: Mr Kaizer Khunwane Xstrata Coal South Africa PO Box 1146 Johannesburg 2000

Notice of Intent to Develop: Zandbaken Coal Mine, near Standerton, Mpumlanga Province.

Karodie, S., Higgit, N., & Nel, J. November 2012. Heritage Statement For The Zandbaken Coal Mine Project, Zandbaken 585 IR, Sandbaken 363 IR And Bosmans Spruit 364 IS, Standerton, Mpumalanga

Xstrata Coal proposes the development of an underground coal mine on the farms Zandbaken 585 IR, Sandbaken 363 IS and Bosmans Spruit 364 IS, within the Gert Sibande District Municipality, Mpumalanga Province. The project location is currently a greenfield area and is approximately 2 890 hectares in size.

The report submitted to SAHRA is a merely a baseline study, inclusive of a Letter of Exemption from undertaking a palaeontological assessment. A field survey did not form part of the baseline assessment. The literature review indicated that no previous impact assessments have been undertaken in the project area. However, impact assessments that were conducted near the project area identified few heritage resources most notably cemeteries and farmsteads. The proposed coal mine will require the following infrastructure development:

- Construction of surface infrastructure;
- · Blasting and development of an initial boxcut for mining;
- Temporary storage of hazardous products;
- · Removal of overburden:
- Use of haul roads;
- · Removal and stockpiling of raw coal;
- · Water use and storage on site; and
- Storage, handling and treatment of hazardous products.

The baseline assessment which included archival research, maps, and review of previous archaeological impact assessments indicated that at at least 10 heritage resources are located within the footprint of the proposed development (Plan 8, p. 50). However, it is not yet clear how these will be affected with regard to the location of surface infrastructure for the proposed mine.



DWE_XST1716_ZANDBAKEN COAL MINE PROJECT

Our Ref: 9/2/271/0001

Enquiries: Phillip Hine Tel: 021 462 4502

Email: phine@sahra.org.za

CaseID: 846

Date: Wednesday November 28, 2012

Page No: 2



The project area is underlain by the Transvaal Supergroup which in turn is overlain by the Karoo Supergroup. In the area the Karoo Supergroup is overlain by the Dwyka and the Madzaringwe Formations which contain coal seams and various sequences of sandstone, shale and siltstone. The geological formations underlying the project area are not considered to be of high palaeontological significance in this area and the specialist recommended that project be exempted from further palaeontological assessment.

The baseline study recommended that only the footprint of the proposed development be subject to specialist assessment which should include a Phase 1 Archaeological Impact Assessment, Visual Impact Assessment, Built Environment Assessment (which will include an assessment of the Historical Townscape), a focussed Burial Grounds and Graves Survey, and an exemption from further palaeontological assessment.

Decision:

SAHRA APM Unit supports the recommendation of the specialist report that a Heritage Impact Assessment must be undertaken, inclusive of

- Phase 1 Archaeological Impact Assessment;
- A focussed Burial Grounds and Graves survey;
- · Built Environment Assessment inclusive of a Historical Townscape Assessment and;
- Visual Impact Assessment
- The heritage statement submitted to SAHRA APM unit requested that the proposed project be exempted from a palaeontological impact assessment. However, the report does not provide sufficient evidence to exempt it from a palaeontological assessment. Considering the fact that the Karoo Supergroup, which underlies the project area is known to be fossiliferous, SAHRA APM Unit requires that the project be subject to a Phase 1 palaeontological assessment inclusive of a field survey. This assessment must be undertaken by a professional palaeontologist of good standing.

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

Yours faithfully

Phillip Hine

Heritage Officer



DWE_XST1716_ZANDBAKEN COAL MINE PROJECT

Our Ref: 9/2/271/0001

Enquiries: Phillip Hine Tel: 021 462 4502

Email: phine@sahra.org.za

CaseID: 846

Date: Wednesday November 28, 2012

Page No: 3



Colette Scheermeyer

SAHRA Head Archaeologist South African Heritage Resources Agency

ADMIN:

(DEA, Ref:) (DMR, Ref:)

