



an agency of the
Department of Arts and Culture

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CaseID: 13008

Date: Tuesday April 09, 2019

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Interim Comment

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

Attention: South32 SA Coal Holdings (Pty) Limited

The Vandyksdrift Central (VDDC) area falls within the footprint of the historic Douglas Colliery. In 2007, an amendment of the EMPR for the Douglas Colliery operations was approved, to allow the opencast mining of the remaining seams. The EMPR Amendment did not include any additional infrastructure in support of the opencast mining operations. A pre-feasibility investigation identified the need to develop additional infrastructure to support the proposed opencast mining. The VDDC infrastructure development project is in Mpumalanga.

South32 SA Coal Holdings (Pty) Ltd Wolvekrans Colliery is proposing to start opencast mining located on the farms Kleinkopje 15 IS, Steenkoospruit 18 IS, Vandyksdrift 19 IS and Wolvekrans 17 IS in the eMalahleni Local Municipality of the Mpumalanga Province. The extent of the proposed project will be 1400ha, consisting of a the boxcut and ramps, new Pollution Control Dam (PCD), Topsoil dump, Waste rock dump and other water management infrastructure.

Jones and Wagner Consulting Engineers (Pty) Ltd have been appointed by South32 SA Coal Holdings (Pty) Ltd to undertake an Environmental Impact Assessment (EIA) application process in respect of listed activities in the Environmental Impact Assessment (EIA) Regulations 2014, as amended, that require an application for Environmental Authorisation in terms of the National Environmental Management Act, Act 107 of 1998 (NEMA), as amended. Mine Right in terms of section 22 of the Minerals and Petroleum Resources Development Act, Act 28 of 2002 (MPRDA).

To meet the requirements of section 38(8) of the National Heritage Resources Act, no 25 of 1999, a Heritage Impact Assessment (HIA) Report by Dr J.C.C Pistorius has been submitted to South African Heritage Resources Agency (SAHRA) for commenting.

Pistorius, J.C.C August 2018. A Phase I Heritage Impact Assessment (HIA) Study for the Proposed Vandyksdrift Central (VDDC) Mining Infrastructural Development in the Mpumalanga Province.

The author undertook a field assessment and identified two cemeteries (GY01 and GY02) and some historical structures. None of the identified sites will be impacted by the proposed development however, the cemetery



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(GY01) is located 15 m away from the proposed PCD. The author recommends monitoring of the site, so the site is not damaged. The author further recommends the two graveyards in the VDDC project area must be managed as follows in order to ensure their future unaffected existence in the project area, namely:

- The graveyards must be demarcated with fences or with walls and should be fitted with access gates.
- Regulated visitor hours must be implemented that is compatible with safety rules. This will not be necessary if graveyards area located next to public or national roads which can provide direct access to these graveyards.
- Corridors of at least 30m should be maintained between the graveyard's border fences and any developmental components such as roads or other infrastructure that may be developed in the future.
- Graveyards should be inspected every three months. Inspections should be noted in an inspection register. The register should outline the state of the graveyard during each inspection. Reports on damages to any of the graves or to the graveyards (fences, walls, gates) should be followed with the necessary maintenance work. Maintenance work should be recorded in the inspection register.
- The graveyards should be kept tidy from any invader weeds and any other refuse.

Interim Comment

SAHRA Archaeology, Palaeontology and Meteorites (APM) Unit requires a field based assessment of palaeontological resources. The assessment must be undertaken by a suitably qualified palaeontologist who will undertake the Palaeontological Impact Assessment (PIA), as the development is underlain by very highly sensitive fossiliferous rocks that will be impacted by the proposed development. The PIA must contain a fossil finds procedure a monitoring programme for the long term management of fossils that may be uncovered from mining activities.

The bufferzone of the cemeteries in the HIA must be amended to allow for 100m. The PCD footprint must be amended to allow for the safe retention of the cemetery labeled GY01. A buffer zone of 100m around the perimeter of the cemetery must be maintained at all times, the cemetery must be fenced with an access gate. Social consultation must be undertaken to find the relatives of the graves in the cemetery, and to obtain permission for the fencing of the graves. These conditions must be included in the EMP.

SAHRA will comment further once the PIA is submitted to the case along with the EIA report and its appendices.

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

Yours faithfully

Proposed Infrastructure Development at Vandyksdrift Central

Our Ref: 13008



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Nokukhanya Khumalo
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Phillip Hine
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South African Heritage Resources Agency

ADMIN:

Direct URL to case: <http://www.sahra.org.za/node/513229>
(DMR, Ref:)