

Tel: (015) 2257075
Cell: 083 770 2131
E-Mail: fransroodt2454@gmail.com



P.O. Box 1600
POLOKWANE
0 7 0 0

22 July 2014

Jacana Environmentals cc
P O Box 31675
Superbia, 0759
Polokwane

SPECIALIST DECLARATION: HERITAGE

VELE COLLIERY: ENVIRONMENTAL AUTHORISATION AMENDMENT IN TERMS OF THE NATIONAL ENVIRONMENTAL MANAGEMENT ACT, 1998 (ACT 107 OF 1998)

1. BACKGROUND

Vele Colliery was granted its New Order Mining Right (NOMR) on 19 March 2010 on the farms Overvlakte 125 MS (Ptn 3, 4, 5, 6, 13, 14 and RE), Bergen Op Zoom 124 MS, Semple 155 MS and Voorspoed 836 MS. Limpopo Coal Company (Pty) Ltd (LCC) applied for rectification in terms of Section 24G of the National Environmental Management Act (NEMA), 1998 (Act 107 of 1998) for activities that commenced without environmental authorization on Portions 3, 4 and 5 of the farm Overvlakte 125 MS, Bergen op Zoom 124 MS and Erfrust 123 MS. LCC was granted the Environmental Authorisation in terms of Section 24G of NEMA in July and October 2011.

2. AMENDMENT APPLICATION

Limpopo Coal Company (Pty) Ltd (LCC) seeks to amend certain approved activities listed below.

2.1 Plant modification

The current single stage processing plant would require modification to a two stage processing plant, enabling the production of three products: SSCC, Eskom thermal coal and sized thermal coal. All modifications are situated within the existing plant footprint and therefore covered by the existing specialist studies and Environmental Authorisations.

2.2 Pollution Control Dams (PCD's)

A third PCD with a 10 000m³ capacity and not exceeding the 5m wall height will be constructed within the mining area.

2.3 Haul Road

The haul road network links the open cast pit area with the modular processing plant and the workshop area. The haul road traverses the farms Bergen of Zoom 124 MS and Overvlakte 125 MS in a north-easterly and easterly directions. The haul road is 55 m wide (to accommodate large trucks), 2.89 km and covers an area of 15.97 ha.

This application seeks to amend this provision. This haul road is to be extended by an additional 3 km of which 1.3 km is a re-routing of the approved road to accommodate future mine activities.

2.4 Access Road

The haul road network includes the new access road constructed within the licensed mining area and covers an extent of 6.3ha and is 4.8 km in length. The road runs in a north-south direction and traverses the farm Bergen Op Zoom, the road is planned to link Vele Colliery with the main R572.

The application seeks to provide for the intention as noted in the current EA, i.e. the plan to link the Vele Colliery with the main R572. The access road is to be extended to 10.14 km in length, covering an area of 14.5 ha. The EA failed to include the connection of the road within the mining area to the main R572 despite this being highlighted in the main report and the specialist studies submitted. Final extent will consist of an area of 14.5 ha and will be 10.14 km in length.

2.5 Vegetation clearance

A total area of 109.12 ha of indigenous vegetation, mostly indigenous Mopane (*Colophosspermummopane*) vegetation has been cleared prior to the Section 24G application as part of site preparation to facilitate the construction and development of the required mine infrastructure. The current Environmental Authorisation only provided for the areas disturbed prior to the Section 24G and does not include the full scope of work over the life of mine. To provide for the additional mining and infrastructure requirements for the East Pit operations over the next 16 years and associated infrastructure requirements, an additional area of 393.08 ha will be disturbed and cleared of vegetation. In total an area of 502.2 ha will be disturbed for this phase of the operation. The area of concern for heritage resource is:

2.5.1 Opencast pit north: 290ha

2.5.2 River diversion – Eastern: 1.5 ha

2.5.3 River diversion – Central: 1ha

These areas are discussed under heading 3.5.

3. POSSIBLE IMPACTS ON HERITAGE RESOURCES BY THIS APPLICATION

In line with recommendations in the EMP, Limpopo Coal Company has engaged the services of a heritage specialist to continuously monitor the possible impact of mining activities on heritage resources since 2012. In addition, the heritage specialist has also re-surveyed large areas of land to ensure that no heritage site was missed during the initial surveys. During this process the areas affected by the listed activities of the amendment application were covered.

3.1 Plant modification

Although this modification falls within the footprint of the existing operation, the area was re-surveyed. The modification will have no direct impact on heritage resources. Sites 5 and 19 fall outside the fenced Plant area.

3.2 Pollution Control Dams (PCD's)

The third PCD area is located at general coordinates S22° 08' 29" E29° 40' 11" and was re-surveyed. The area contains a large number of stone cairns. On investigation, information from the previous farm owner stated that the stones were collected and stacked for the purpose of constructing gabions. These cairns have no heritage significance (marked PCD on figure 1).

3.3 Haul Road. See figure 1 for location of heritage sites near the Haul Road.

The northern extension of the Haul Road passes in close proximity to gravesite 30. This site is known, fenced and clearly visible and no impact is expected.

Sites 1 & 23 are located farther north and to date had been distanced from mining activities and were not fenced yet. The northern extension of the Haul Road will stretch close to especially site 23. Although no impact is expected, these sites must be clearly marked and appropriately fenced to avoid impact.

3.4 Access Road

This road was thoroughly surveyed for the G24 application and there will be no impacts on heritage resources.

3.5 Vegetation clearance

3.5.1 Opencast pit north: 290 ha

The opencast pit north area contains a number of gravesites and archaeological sites. The gravesites are sites 30 and 31 and probably other isolated grave not yet identified. The known archaeological sites are sites 1, 23 and 35. LCC is in possession of the coordinates for all of these sites.

In order to manage any impact on a heritage site, LCC should liaise with the heritage specialist for adequate protection of possible affected sites. In the long term all of the above-mentioned sites will be adversely affected by the approved opencast mining and therefore LCC should engage timeously with SAHRA to acquire the necessary authorisations for destruction or damage to heritage sites.

3.5.2 River diversion – Eastern: 1.5 ha

This area was re-surveyed and is clear of any heritage resource. No impact is expected.

3.5.3 River diversion – Central: 1ha

This area was re-surveyed and is clear of any heritage resource. No impact is expected.

4. CONCLUSION AND RECOMMENDATIONS

The amendment application poses no direct threat to heritage resources in the short term. For the Haul Road and Vegetation Clearance applications, caution is required at gravesites 30 & 31 and archaeological sites 1 & 23.

It is recommended that the above-mentioned sites are appropriately safeguarded in the interim, and that SAHRA approved permits be obtained for the destruction of the archaeological sites and the re-location of the graves mentioned above in terms of Sections 35 & 36 of the National Heritage Resources Act (Act no. 25 of 1999).

5. SPECIALIST DECLARATION

I, FransRoodt, Principal investigator listed with the Association of Southern African Professional Archaeologists (ASAPA) and SAHRA declare that this amendment application at Vele Colliery falls within the footprint of the original Vele Heritage Impact Assessment Report authored by me and subject to the recommendation above, will have no direct impact on heritage resources.

A handwritten signature in black ink, appearing to read 'Roodt', with a large, stylized initial 'R'.

FRANSROODT (*BA Hons, MA Archaeology*)



Figure 1. Approximate position of the Haul Road extension – Note location of sites 30 & 23.