

Prepared for:

SLR Consulting (Africa) (Pty) Ltd

Johannesburg 2060

Tel 0114670945

Fax 0114670978

**LETTER FOR EXEMPTION FOR A PHASE I HERITAGE IMPACT
ASSESSMENT STUDY FOR THE BASIC ASSESSMENT AND
ENVIRONMENTAL MANAGEMENT PROGRAMME FOR THE
CLOSURE OF THE KLIPGATKOP PROSPECTING RIGHT NEAR
RUSTENBURG IN THE NORTH WEST**

Prepared by:

Dr Julius CC Pistorius

Archaeologist & Heritage Consultant

Member ASAPA

8 5th Avenue Cashan x 1

Rustenburg 0299

PO Box 1522 Bela Bela 0480

Cell 0825545449

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1 DETAILS OF THE SPECIALIST

Profession: Archaeologist, Museologist (Museum Scientists), Lecturer, Heritage Guide Trainer and Heritage Consultant

Qualifications:

BA (Archaeology, Anthropology and Psychology) (UP, 1976)

BA (Hons) Archaeology (distinction) (UP, 1979)

MA Archaeology (distinction) (UP, 1985)

D Phil Archaeology (UP, 1989)

Post Graduate Diploma in Museology (Museum Sciences) (UP, 1981)

Work experience:

Museum curator and archaeologist for the Rustenburg and Phalaborwa Town Councils (1980-1984)

Head of the Department of Archaeology, National Cultural History Museum in Pretoria (1988-1989)

Lecturer and Senior lecturer Department of Anthropology and Archaeology, University of Pretoria (1990-2003)

Independent Archaeologist and Heritage Consultant (2003-)

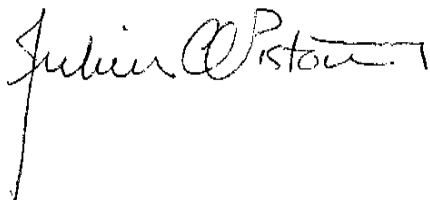
Accreditation: Member of the Association for Southern African Professional Archaeologists. (ASAPA)

Summary: Julius Pistorius is a qualified archaeologist and heritage specialist with extensive experience as a university lecturer, museum scientist, researcher and heritage consultant. His research focussed on the Late Iron Age Tswana and Lowveld-Sotho (particularly the Bamalatji of Phalaborwa). He has published a book on early Tswana settlement in the North-West Province and has completed an unpublished manuscript on the rise of Bamalatji metal workings spheres in Phalaborwa during the last 1 200 years. He has excavated more than twenty LIA settlements in North-West and twelve IA settlements in the Lowveld and has mapped hundreds of stone walled sites in the North-West. He has written a guide for Eskom's field personnel on heritage management. He has published twenty scientific papers in academic journals and several popular articles on archaeology and heritage matters. He collaborated with environmental companies in compiling State of the Environmental Reports for Ekurhuleni, Hartebeespoort and heritage management plans for the Magaliesberg and Waterberg. Since acting as an independent consultant he has done approximately 800 large to small heritage impact assessment reports. He has a longstanding working relationship with Eskom, Rio Tinto (PMC), Rio Tinto (EXP), Impala Platinum, Angloplats (Rustenburg), Lonmin, Sasol, PMC, Foskor, Kudu and Kelgran Granite, Bafokeng Royal Resources, Pilanesberg Platinum Mine (PPM) etc. as well as with several environmental companies.

2 DECLARATION OF INDEPENDENCE

I, Dr Julius CC Pistorius declare the following:

- I act as an independent specialist in this application;
- I will perform the work relating to the application in an objective manner, even, if this result in views and findings that are not favourable for the applicant;
- I declare that there are no circumstances that may compromise my objectivity in performing such work;
- I have expertise in conducting the specialists report relevant to this application, including knowledge of the Act, Regulations and any guidelines that have relevance to the applications;
- I will comply with the Act, Regulations and other applicable legislation;
- I will consider, to the extent possible, the matters listed in Regulation 13;
- I understand to disclose to the applicant and the competent authority all material information in my possession
- All the particulars furnished by me in this form are true and correct that reasonably has or may have the potential of influencing - any decision to be taken with respect to the application by the competent authority; and - the objectivity of any report, plan or document to be prepared by myself for submission to the competent authority; and
- I realise that a false declaration is offence in terms of regulation 48 and is punishable in terms of section 24F of the Act.



1 July 2019

3 INTRODUCTION

3.1 Background and context

The Royal Bafokeng Resources Platinum (Pty) Ltd / Impala Platinum Limited Unincorporated Joint Venture (RBRP/Impala JV) hold a prospecting right MPT number 638/2007 PR (DMR reference number NW30/5/1/1/2/519 (10368) PR) for platinum group metals (PGMs), silver, gold ore, cobalt, chrome ore and nickel ore on the Remaining Extent and Portion 1 of the farm Klipgatkop 115 JQ (Klipgatkop). The prospecting right area is located approximately 21 km north east of Rustenburg in the Rustenburg Local Municipality and the Bojanala Platinum District Municipality in the North West Province. The regional setting is illustrated in Figure 1. The description of the property is outlined in Table 1.

Between May 2007 and June 2014, Impala on behalf of the RBRP/Impala JV undertook prospecting activities on the farm Klipgatkop, during which time eight approved exploration drill holes were drilled.

Impala has faced tremendous economic and financial challenges throughout the last few years. The RBRP/Impala JV thus proposes to close the Klipgatkop prospecting right.

SLR Consulting (Africa) (Pty) Ltd (SLR), an independent firm of environmental assessment practitioners (EAP), has been appointed by Impala on behalf of the RBRP/Impala JV to manage the environmental authorisation processes associated with the closure of the Klipgatkop prospecting right.

3.2 Aims with the report

This brief report serves as motivation that earlier heritage surveys for the Klipgatkop prospecting area were undertaken and that no heritage sites were recorded on Klipgatkop 115JQ (Part 6, 'Bibliography relating to earlier heritage studies'). This brief report therefore serves as letter of exemption for a Phase I heritage survey for the Basic Assessment and Environmental Management Programme compiled by SLR for the closure of prospecting activities on this farm.

3.3 Assumptions and limitations

It is possible that the earlier heritage survey of Klipgatkop 115JQ may have missed heritage resources as heritage sites may be covered with grass or vegetation whilst others may be located below the surface of the earth and may only be exposed once development commences. It is also possible that heritage resources may simply have been missed as a result of human failure to detect them.

4 THE KLIPGATKOP PROSPECTING AREA

4.1 Description

A description of the Klipgatkop prospecting area on the farm Klipgatkop 115JQ is provided in Table 1.

Description	Details
Farm Name	Remaining Extent and Portion 1 of the farm Klipgatkop 115 JQ
Closure application area (ha)	520 ha
Magisterial district	The Prospecting Right area is located within the Rustenburg Magisterial District and in the Bojanala Platinum District Municipality.
Distance and direction from nearest town	The proposed project site is located approximately 21 km north west of Rustenburg.
21-digit Surveyor General Code for each farm portion	Remaining Extent of the farm Klipgatkop 115 JQ - T0JQ00000000011500000 Portion 1 of the farm Klipgatkop 115 JQ - T0JQ00000000011500001
Co-ordinates	North eastern corner: 27°15'22.911"E; 25°26'31.002"S South eastern corner: 27°15'31.575"E; 25°27'50.32"S South western corner: 27°14'19.158"E; 25°27'51.177"S North western corner: 27°13'56.367"E; 25°26'41.063"S

Table 1- Description of the Klipgatkop prospecting area (above).

4.2 Location of the prospecting area

The regional location of the Klipgatkop prospecting area is indicated in Figure 1.

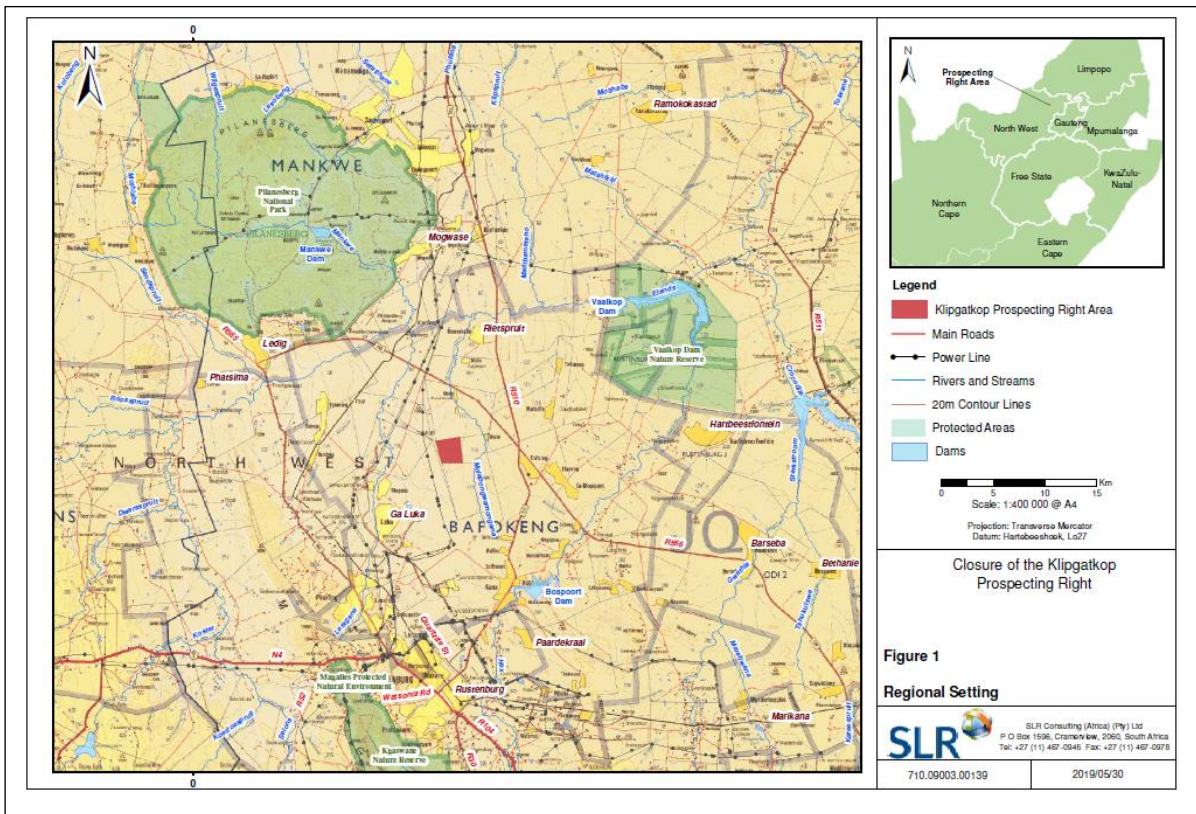


Figure 1- Regional location of the Klipgatkop prospecting area (above).

4.3 The nature of the concluded prospecting activities on Klipgatkop

4.3.1 Prospecting activities

Prospecting activities undertaken between September 2006 and August 2014 included the following:

- Use of existing roads/ tracks (as far as possible).
- Establishment and use of new access tracks where prospecting related vehicles had to deviate from existing roads.
- Drilling of eight approved drill holes (BH7025 drilled in 2007; BH7599, BH7600 and BH7608 – drilled in 2008; BH7799 – drilled in 2009; BH7856 – drilled in 2010, 2011 and 2012, BH8062 -- drilled in 2012, and BH8063 – drilled in 2013 and 2014 (Figure 3)

- Establishment and use of site equipment and support facilities (drill rigs, trucks, compressor, plastic lined drilling water containment facility (sump), water cart, core sample trays) and portable chemical toilets etc. (Figure 2).

4.3.2 Progressive rehabilitation

Progressive rehabilitation took place as prospecting activities advanced. Rehabilitation commenced as each drill site was completed and decommissioned. Rehabilitation activities were aligned with RBRP/Impala JV's approved EMP and closure objectives.

A site visit was conducted on 24 April 2019 and it was noted that six of the drill sites had fully re-established (BH7025, BH7599, BH7600, BH7856, BH7799, and BH7608).

For drill site BH8063, while not completely re-established, the site seemed less sparse compared to the pre-drilling baseline; the 2013 pre-drilling photograph shows that the area in general was very sparse with much soil exposure. BH8063 is thus considered to have successfully re-established and no additional monitoring is deemed necessary.

Drill site BH8062 re-vegetation was still in progress as there were some small patches of exposed soils. The general area around the property looks similar to this prospecting site, i.e. the presence of exposed soil; it is likely that the overgrazing in the Klipgatkop prospecting right area hampers the ability of vegetation to fully recover at the drill site. The vegetation is thus considered to have re-established to a satisfactory level and no additional monitoring is deemed necessary.

4.3 Types and ranges of heritage resources

Earlier heritage surveys for Impala for various mining related projects as well as for prospecting activities did not reveal the presence of heritage resources in the Klipgatkop prospecting area (see Part 6, 'Select Bibliography relating to earlier heritage studies', particularly bolded reports) (Figure 2).

4.4 Summary

It is clear from Figure 2 that none of the prospecting drill holes coincided with any heritage resources in the Klipgatkop prospecting area. Consequently, prospecting activities in the Klipgatkop prospecting area did not impact on any heritage resources. No management measures therefore are needed as no heritage resources were observed in the prospecting area.

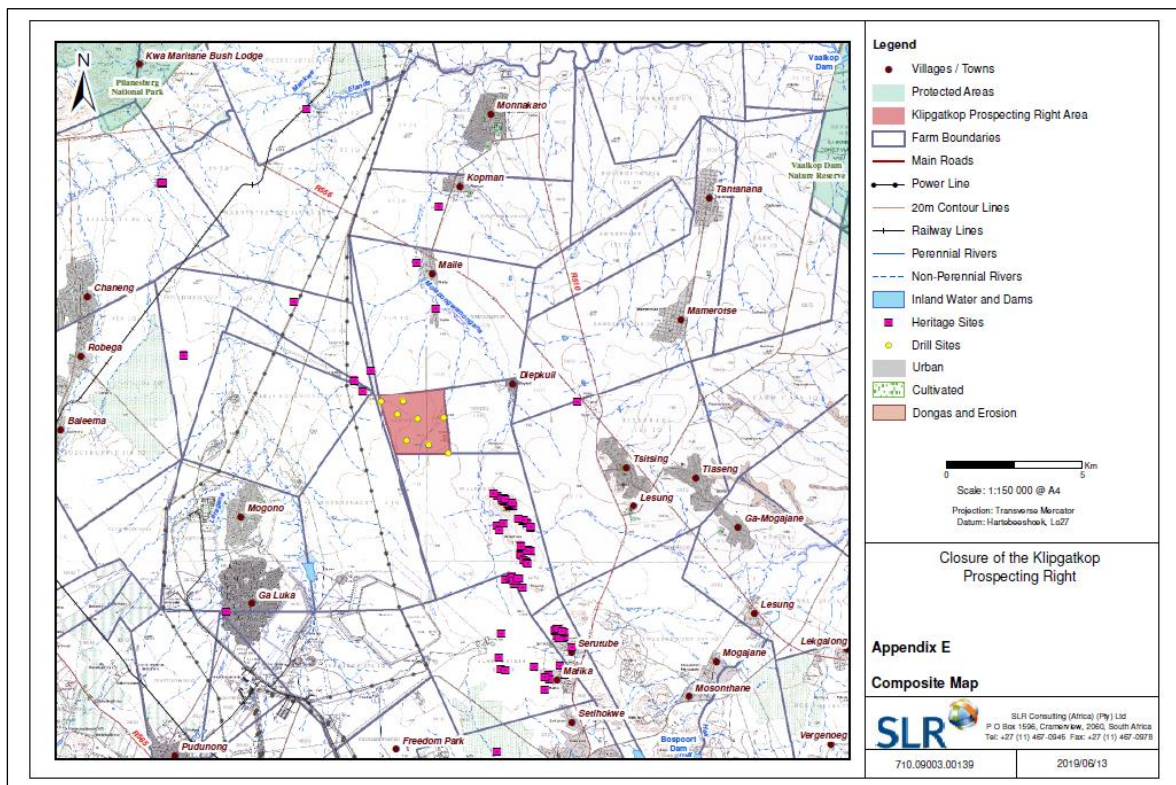
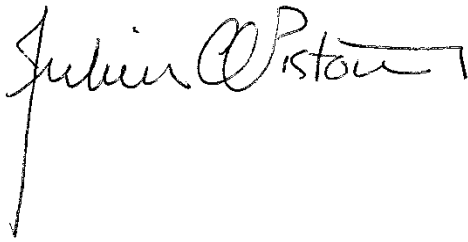


Figure 2- Composite map for the Klipgatkop prospecting area reveals the presence of no heritage sites and the location of eight prospecting drill holes (above).

5 CONCLUSION

It is clear from Figure 2 that none of the prospecting drill holes coincided with any heritage resources in the Klipgatkop prospecting area. Consequently, prospecting activities in the Klipgatkop prospecting area did not impact on any heritage resources. No management measures therefore are needed as no heritage resources were observed in the prospecting area.

The closure of the prospecting site therefore does not require any physical activities to take place on site and no further disturbance will be occurring at the prospecting areas for closure of the prospecting right.

A handwritten signature in black ink, reading "Julius CC Pistorius". The signature is written in a cursive style with a long vertical line extending downwards from the first letter 'J'.

DR JULIUS CC PISTORIUS
Archaeologist & Heritage Consultant
Member ASAPA

6 BIBLIOGRAPHY RELATING TO EARLIER HERITAGE STUDIES

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