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To: **Nokukhanya Khumalo** nkhumalo@sahra.org.za

From: **Environmental Assurance (Pty) Ltd**

Mrs Naadira Nadasen

naadira@envass.co.za

Date: **11 July 2022**

RESPONSE TO COMMENT ON MAREESBURG CHROME MINE COMPRISES OF THE FARM MAREESBURG 8 JT SITUATED IN THE STEELPOORT AREA. THE PORTIONS ARE AS FOLLOWS: PORTION 0 OF THE FARM MAREESBURG 8 JT (RE EXTENT); PORTION 1 OF THE FARM MAREESBURG 8 JT; PORTION 2 OF THE FARM MAREESBURG 8 JT; PORTION 6 OF THE FARM MAREESBURG 8 JT; AND PORTION 7 OF THE FARM MAREESBURG 8 JT. THIS FARM LIES WITHIN THE PROVINCIAL BOUNDARIES OF THE LIMPOPO PROVINCE, AND FALLS WITHIN THE SEKHUKHUNE DISTRICT MUNICIPALITY OF THE LIMPOPO PROVINCE

This letter is in response to the correspondence received on 13 June 2022 from Ms. Nokukhanya Khumalo from the South Heritage Resource Agency (SAHRA).

ENVASS would like to thank the SAHRA for providing comments. All comments from state entities are valuable inputs in the sustainable planning of authorisation projects.

ENVASS hereby respond to them in the order they were raised. Your comments together with the responses will be submitted to the competent authority.

Please find below responses to comments made:



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Comment:

Samancor (Pty) Ltd Mareesburg Chrome Mine have appointed Environmental Assurance (Pty) Ltd to undertake an environmental assessment as part of the Basic Assessment application process in support of an Environmental Authorisation (EA) in terms of the National Environment Management Act, Act 107 of 1998 (NEMA) for activities that trigger the NEMA EIA 2014 Regulations. As well as the requirements of the Minerals and Petroleum Resources Development Act, No 28 of 2002 (MPRDA)(As amended).

Mareesburg Chrome Mine will be an opencast and underground chrome 980.3 ha in extent and targeting the middle group chromite seams. The opencast area including 191 ha in extent.

A Heritage Impact Assessment (HIA) report was submitted to the South African Heritage Resources Agency (SAHRA) for commenting in terms of section 38(8) of the National Heritage Resources Act, Act 25 of 1999 (NHRA).

Response:

This comment is noted. Details of the proposed works can be found in the Final EIA that was uploaded onto the SAHRA website.

Comment:

Coetzee, T. February 2022. Phase 1 Archaeological Impact Assessment for the Proposed ECM Mareesburg Mining Development on Portions of the Farm Helena 6 JT and Mareesburg 8 JT, Steelpoort, Limpopo:

The author undertook a field assessment of the proposed development area and identified various sites of heritage significance, however, the report mainly assesses sites within the opencast zone. Sites K09 & K10 are Later Iron Aged (LIA) sites consisting of upper and lower grinding stones and dilapidated stone walling. Both these sites are unrelated to the LIA stonewalled sites of the region and they are both sufficiently recorded in this report. An MSA scraper was identified as site K06, and site K01 is a ploughshare with bricks, both these sites are sufficiently recorded in the report. Site K03 is a stone cairn and site K02 is a potential grave site located in the underground mine section. Site K03 is located on top of bedrock and is unlikely to demarcate a burial, this site is sufficiently recorded in the report. There are two areas in the proposed opencast section that are designated sensitive areas because of the clusters of stonewalled



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enclosures with some potsherds visible on the surface. Sensitive area 1 is 4.9 ha in extent and Sensitive area 2 is 23.5 ha in extent. Sites K04, K05, K07, K08 are MSA and an ESA stone tools located in sensitive area 2.

Response:

The following responses were obtained after consultation with the Heritage Specialist:

- Sites K09 & K10, respectively consisting of an upper and lower grinding stone, and dilapidated stone walling, are not associated with additional material culture and no other features or artefacts were observed within close proximity of these sites. The sites are not considered to be of high significance and the recording done during this study is regarded as sufficient.
- Site K06 consists of a MSA scraper located near a river. No other artefacts were observed in the direct vicinity. The site is not considered to be of high significance and the recording done during this study is regarded as sufficient.
- Site K01, a ploughshare and a few bricks, might date to the historic period but are not considered to be significant or unique. The recording done during this study is regarded as sufficient.
- Site K03 consists of a stone cairn located on solid rock and is not associated with any material culture. The site is therefore not considered to be of cultural significance and the recording done during this study is regarded as sufficient.
- The potential grave (Site K02) should not be affected as it is away from the opencast activities. However, the 10m buffer will be considered as per the specialist recommendations. Alternatively, a grave relocation process will be undertaken under the oversight of a qualified Heritage practitioner if the grave is to be relocated.
- With respect to Sensitive Area 2 (K04, K05, K07, K08), as recommended by the Heritage Specialist, a Phase 2 AIA will be conducted as the above-mentioned sensitive areas occur within the Preferred Alternative 1 opencast mining area. The Phase 2 AIA will map the Late Iron Age-LIA sites in detail and will include test pit excavations. A surface collection of the stone age material will also be conducted in the event of a Phase 2 AIA.

Comment:

The author recommends the following to be implemented throughout the life of the mine:



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- Site K02 must be conserved in situ with a 10m buffer zone and it must be fenced.
- Sensitive areas 1 and 2 should be conserved in situ, if the mine is unable to then they must be mitigated. If the sites are to be mitigated then an archaeologist must map the sites in detail, test pits will have to be made to determine the depth of any archaeological deposits, and a sample of MSA and ESA stone tools to be collected.
- If any surface activities in the underground mining section then an archaeologist must be appointed to inspect the area and a report compiled.
- The chance finds procedure must be implemented by the ECO and they must be included in the EMP.
- It should be noted that the development area is underlain by geological strata that has negligible palaeontological significance and according to the paleo map policy no studies are required.

Response:

The client acknowledges the above and will ensure mitigation measures as recommended by the Heritage Specialist are adopted. With regards to the chance find procedure, the heritage specialist has indicated that as per page 54 of the Heritage Assessment the following recommendation should suffice; "Because archaeological artefacts generally occur below surface, the possibility exists that culturally significant material may be exposed during the construction and development phases, in which case all activities must be suspended pending further archaeological investigations by a qualified archaeologist. Also, should skeletal remains be exposed during development and construction phases, all activities must be suspended and the relevant heritage resources authority contacted (See National Heritage Resources Act, 25 of 1999 section 36 (6))." Additionally, the client's SHEQ/Mine Manager/ ECO will monitor activities and should any heritage material of cultural significance be encountered, SAHRA or a qualified archaeologist must be contacted and activities affecting the find must be stopped until investigated. This is also addressed on Page 55-56 of the Final EMP.

Comment:

Interim Comment:

The SAHRA Archaeology, Palaeontology, and Meteorites (APM) Unit notes the submission of the HIA reports however, the SAHRA requires the submission of the environmental documents mentioned in the HIA report.



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Response:

The EAP has uploaded the Final EIA and EMP_r including all supportive reports on the website as requested.

Yours sincerely,

Naadira Nadasen

Registered Environmental Assessment Practitioner