

Our Ref:



an agency of the
Department of Arts and Culture

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South African Heritage Resources Agency | 111 Harrington Street | Cape Town
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CaseID: 16076

Date: Sunday May 09, 2021

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Final Comment

In terms of Section 38(4), 38(8) of the National Heritage Resources Act (Act 25 of 1999)

Attention: Acacia Resources

Draft BAR for The proposed Prospecting Right application without bulk sampling for the prospecting of Chrome ore (Cr): LG & MG Seams and Platinum Group Metals (PGM) on the 1) Remaining Extent of the farm Doornspruit 106, Registration Division:JQ, North West province.

Milnex CC has been appointed by Acacia Resources (Pty) Ltd to conduct an Environmental Authorisation (EA) Application for the prospecting rights application of Chrome ore (Cr): LG and MG Seams and Platinum Group Metals (PGM) on the remaining extent of the Farm Dornspruit 106 registration division JQ, North West Province.

A draft Basic Assessment Report (dBAR) has been submitted in terms of the National Environmental Management Act, no 107 of 1998 (NEMA) and the NEMA Environmental Impact Assessment (EIA) Regulations. The scope of work includes prospecting without bulk sampling on 2557.1677 Ha for 200 boreholes (max. depth 70m) and 100 pits (10m x 4m x 2.5m).

In an interim comment issued on 19/02/21 SAHRA's Archaeology, Palaeontology and Meteorites (APM) Unit acknowledged receipt of a dBAR and requested that an assessment of heritage resources including a Desktop assessment of the potential impact of the proposed project on Palaeontological resources (PIA) be conducted by a suitably qualified specialist and submitted to the case for comment. Both the Archaeological component of the Heritage Impact Assessment (HIA) together with a Desktop PIA have been submitted to the case.

Milnex CC, Françoise P. Coetzee, and Banzai Environmental have been appointed to provide heritage specialist input as part of the BAR process as required by section 24(4)b(iii) of NEMA and section 38(3) and 38(8) of the National Heritage Resources Act, Act 25 of 1999 (NHRA).

Coetzee, F.P. 2021. Cultural Heritage Impact Assessment: Phase 1 Investigation of the Proposed Prospecting Rights Application Without Bulk Sampling for the Prospecting of Chrome ore and Platinum Group Metals (PGM) on the remaining extent of the Farm Dornspruit 106 JQ, Rustenburg Local Municipality, Bojanala Platinum District Municipality, North West Province.

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No archaeological (both Stone Age and iron Age) artefacts, features, assemblages, structures, or settlements were recorded during the survey of the project footprint. It is well-known that Late Iron Age stone-walled settlements do not usually occur in open low-lying grasslands, especially black cotton soils high in clay content. However, a Chance Find Protocol is recommended for the Control Environmental Officer given the occurrence of cultural heritage resources in the larger area of the project.

Three (3) active cemeteries (Sites 1-3) were recorded during the survey. These sites are probably associated with a mid 20th Century starting phase of two township Farms called Mogono and Ga Luka and have been used since. According to the specialist it should be noted that an EA has been submitted for an additional cemetery as indicated in Figure 28 of the report which will be 10 ha in size. In this regard the specialist has proposed the following mitigations: 1. the position of the proposed cemetery should be noted, 2. a buffer zone of 50m should be maintained on the periphery of existing cemeteries, 3. care should be taken to avoid any indirect impact on the graves.

Butler, E. 2021. Palaeontological Desktop Assessment For: Proposed Prospecting Rights Application Without Bulk Sampling for the Prospecting of Chrome ore and Platinum Group Metals (PGM) on the remaining extent of the Farm Dornspruit 106 Registration Division: JQ, North West Province.

A low significance has been allocated to the proposed development. Such an allocation according to the specialist is based on the observation that the Quaternary aeolian gravel is moderate while that of the Rustenburg Layered Suite of the Bushveld Complex is zero as it is igneous in origin. A Chance Find Procedure is recommended for the Control Environmental Officer.

Final Comment

The following comments are made as a requirement in terms of section 3(4) of the NEMA Regulations and section 38(8) of the NHRA in the format provided in section 38(4) of the NHRA and must be included in the Final BAR and EMPr:

- 38(4)a – The SAHRA Archaeology, Palaeontology and Meteorites (APM) Unit has no objections to the proposed development;
- 38(4)b – The recommendations of the specialists are supported and must be adhered to. No further additional specific conditions are provided for the development.
- 38(4)c(i) – If any evidence of archaeological sites or remains (e.g. remnants of stone-made structures, indigenous ceramics, bones, stone artefacts, ostrich eggshell fragments, charcoal and ash

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concentrations), fossils or other categories of heritage resources are found during the proposed development, SAHRA APM Unit (Elijah Katsetse/Phillip Hine 021 462 5402) must be alerted as per section 35(3) of the NHRA. Non-compliance with section of the NHRA is an offense in terms of section 51(1)e of the NHRA and item 5 of the Schedule;

- 38(4)c(ii) – If unmarked human burials are uncovered, the SAHRA Burial Grounds and Graves (BGG) Unit (Thingahangwi Tshivhase/Mimi Seetelo 012 320 8490), must be alerted immediately as per section 36(6) of the NHRA. Non-compliance with section of the NHRA is an offense in terms of section 51(1)e of the NHRA and item 5 of the Schedule;
- 38(4)d – See section 51(1) of the NHRA;
- 38(4)e – The following conditions apply with regards to the appointment of specialists:
- If heritage resources are uncovered during the course of the development, a professional archaeologist or palaeontologist, depending on the nature of the finds, must be contracted as soon as possible to inspect the heritage resource. If the newly discovered heritage resources prove to be of archaeological or palaeontological significance, a Phase 2 rescue operation may be required subject to permits issued by SAHRA;
- The Final BAR and EMPr must be uploaded to the SAHRIS application for record purposes;
- The decision regarding the EA Application must be communicated to SAHRA and uploaded to the SAHRIS Case application.

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

Yours faithfully

Elijah Dumisani Katsetse
Heritage Officer
South African Heritage Resources Agency

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Phillip Hine

Manager: Archaeology, Palaeontology and Meteorites Unit
South African Heritage Resources Agency

ADMIN:

Direct URL to case: <https://sahris.sahra.org.za/node/556387>
(, Ref: NW30/5/1/1/2/12862PR)

Terms & Conditions:

1. This approval does not exonerate the applicant from obtaining local authority approval or any other necessary approval for proposed work.
2. If any heritage resources, including graves or human remains, are encountered they must be reported to SAHRA immediately.
3. SAHRA reserves the right to request additional information as required.