



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: 11329

Date: Friday October 13, 2017

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## Interim Comment

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

Attention: Magdalena von Ronge

Northam Platinum

Farm Booyensdal 43 JT, Greater Tubatse Local Municipality

**Booyensdal Platinum Pty Ltd commenced with the expansion of their mining activities through the construction of a new portal, a +13m wide access road, an areal rope conveyor, stormwater management infrastructure etc. Various heritage finds are within the wider area where development is taking place.**

Booyensdal (Pty) Ltd a subsidiary of Northam Platinum Limited has commenced with the construction of mine infrastructure for BS1/2 areas that form part of the Booyensdal South Expansion project, without the necessary authorisations and specialist studies as regulated in the National Environmental Management Act, Act no. 107 of 1998 (NEMA), and NEMA Environmental Impact Assessment (EIA) Regulations, 2014/2017 as amended. The entire project consists of the construction of surface mining infrastructure and underground mining infrastructure for the three subdivided areas of Booyensdal South mine area (BS1/BS2; BS3 and BS4) as well as the Merensky Portal expansion project consisting of the construction of 2 adits and various linear infrastructures. The Project falls within the Thaba Chweu Local Municipality of Mpumalanga Province and the Greater Tubatse Local Municipality of Limpopo Province. The affected farms are Buttonshope 51 JT; Booyensdal 43 JT; Sterkfontein 52 JT; Sterkfontein 749 JT; and De Kafferskraal 53 JT. Majority of the areas fall within the Mpumalanga border apart from the proposed overland conveyor belt to the northern section of the mine right, which is in the Limpopo Province.

*Pistorius, J.C.C. May 2017. A Phase I Archaeological and Heritage Impact Assessment (HIA) Study for Booyensdal South Expansion Environmental Authorisations.*

The author undertook a field survey of the proposed development activities in the BS4 area of the Booyensdal South Expansion project area. BS4 is located within the Mpumalanga Province and used to be named the Everest Mine. 13 sites were identified within this area of which one site (HV02) will be damaged by surface construction activities. Three sites are historical ruins, H01 is a colonial farmhouse made of stone, and is potentially associated with two identifiable graves named GY01. H02 and H03 are ruins of homesteads on the banks of the Groot Dwars River. HV01-4 are stone walled Later Iron Age features apart from HV03 which is a dwelling made of clay bricks and plastered walls. This site is also linked to GY05 a cemetery with 9 graves, with three of the graves identifiable and have recent dates on the tombstones. Furthermore, this area has a



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presence of 5 graveyards and 2 single graves (named GY01 to 5 and Grave 1 and Grave 2), all of the graveyards are not fenced. Grave 2 is located close to the mine infrastructure although no impacts are foreseen to this grave site.

A previous heritage assessment by Van der Walt and Celliers conducted in 2016 had identified 49 heritage sites within the same area. The author of this report had surveyed the area again to identify sites that may have been damaged before the section 24G application, and only identified 35 sites. Ten sites identified were damaged by infrastructure developments at BS1/2 and ground clearance activities, within the areas which construction commenced without the necessary authorisations. Sites 355 and 356 were historical ruins of low to medium significance. Sites 610, 611, 612a and b, 614, 615, 616 and 617 were Iron Age features also of low to medium significance.

Only one site (HV02) identified, in the BS1/2 area, will be impacted by proposed activities.

The author recommends the following mitigation and conservation measures:

Before construction resumes, the site HVO2 needs to be mitigated using methods that include mapping, photographing and test excavations.

The remaining sites should be registered in a heritage register, with uniform site numbering standards and their types and ranges.

A buffer zone of 30 m around each site, including graves, should be maintained at all times during construction and operation of the mine.

All identified graves must be fenced and fitted with an access gate. A regulated visiting schedule should be compiled and implemented so relatives are able to gain access to the graves.

Graves should be monitored every 3 months and a report on the damages compiled. The damages should be fixed or mitigated.

Mitigation of graves is not permissible unless the required National Heritage Resources Act, no 25 of 1999 (NHRA) s. 36 permit is obtained from the South African Heritage Resources Agency (SAHRA).

## Interim Comment

SAHRA Archaeology, Palaeontology and Meteorites (APM) Unit does not endorse the following

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recommendations provided in the HIA report:

- The statement that a palaeontological assessment is not required, is not endorsed as the author of the heritage report is not a qualified palaeontologist. SAHRA requires that a Palaeontological Desktop Assessment of the development area is conducted by a suitably qualified palaeontologist;
- The HIA report does not provide detailed information on the heritage resources that were destroyed in the BS1/BS2 areas, photos of the area in which the destroyed sites were not provided, an assessment of extent of destruction and what artefacts in the topsoil heaps was not provided. A detailed assessment of destruction needs to be provided in the HIA.
- As the destroyed sites were first recorded in the Van der Walt and Celliers 2016 report, this report must be submitted to the case for commenting.
- It must be noted that the destruction of heritage resources without a permit is an offence as per 51(1)b of the NHRA.

Additional conditions that must be adhered to include the following:

- A permit in terms of section 36(3)b of the NHRA needs to be applied for, to the Burial Grounds and Graves (BGG) Unit, for the fencing of the graveyards;
- A permit in terms of section 35(4) of the NHRA needs to be applied for, for the mitigation of site HV02; and
- All heritage monitoring reports must be submitted to SAHRA for comments.

SAHRA APM Unit will only issue further comments upon receipt of the above requested information.

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

Yours faithfully

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Nokukhanya Khumalo  
Heritage Officer  
South African Heritage Resources Agency

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Phillip Hine

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

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**ADMIN:**

Direct URL to case: <http://www.sahra.org.za/node/405527>

(DMR, Ref: LP30/5/1/2/3/2/1(188) EM & MP30/5/1/2/3/2/1(127) EM )