

Our Ref:



an agency of the  
Department of Arts and Culture

T: +27 21 462 4502 | F: +27 21 462 4509 | E: info@sahra.org.za  
South African Heritage Resources Agency | 111 Harrington Street | Cape Town  
P.O. Box 4637 | Cape Town | 8001  
www.sahra.org.za

Enquiries: Natasha Higgitt  
Tel: 021 462 4502  
Email: nhiggitt@sahra.org.za  
CaseID: 11479

Date: Friday September 01, 2017  
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## Interim Comment

### In terms of Section 38(3) of the National Heritage Resources Act (Act 25 of 1999)

Attention: Benard Madziwa

#### **PHASE I HERITAGE IMPACT ASSESSMENT STUDY IN RESPECT OF APPLICATION FOR MINING RIGHT (DIAMONDS) ON THE FARM PALMIETFONTEIN 208JP, NEAR PILANESBERG, MOSES KOTANE LOCAL MUNICIPALITY, BOJANALA DISTRICT, NORTHWEST**

EnviroSheq Consulting has been appointed to conduct a Heritage Impact Assessment (HIA) for the proposed Mining Right Application on the farm Palmietfontein 208JP near Pilansberg, North West Province. The applicant (Fidulex Pty Ltd) intends to prospect for and mine diamonds and components of the project will include clearance of vegetation, excavation, removal and stockpiling of topsoil cover, a processing plant, clean water storage dam and drains channelling water to the dam, as well as a return water dam, septic tank and associated infrastructure for containment/storage and transportation of sewage waste from the ablution facilities, maintenance workshop, salvage yard for temporal storage and screening of waste miscellaneous material. The HIA is being conducted in terms of section 38 of the National Heritage Resources Act, Act No 25 of 1999 (NHRA) and will form part of a Environmental Authorisation Application in terms of the National Environmental Management Act, 1998 (NEMA) and the Environmental Impact Assessment (EIA) Regulations 2014 for activities that trigger the Mineral and Petroleum Resources Development Act, 2002 (MPRDA)(As amended). The application area is 2 314.8552 ha and will entail strip mining, a screening plant, mobile site office, ablution facilities and access roads.

*Matenga, E. 2017. Phase 1 Heritage Impact Assessment Study in respect of an application for a mining right (Diamonds) on the farm Palmietfontein 208JP, near Pilansberg, Moses Kotane Local Municipality, Bonjanala District, North West.*

A total of seven heritage resources were identified within the proposed development area which includes one Middle Stone Age (MSA) stone tool (Medium B heritage significance), two stone walled features (Medium A heritage significance), two large cemeteries (High heritage significance), a Pioneer Lutheran Church (Medium A heritage significance) and previous mining infrastructure (Low heritage significance).

Recommendations provided in the report include the following:

- The two cemetery sites and the stone walled features must be fenced off;

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- If mining operations require extension, mitigation strategies must be weighed carefully including the option of exhumation and relocation of graves to a formal cemetery. Such a proposal will have to be discussed with local communities and relatives/descendants of the deceased to reach consensus;
- The Lutheran church must also be protected.

### Interim Comment

The SAHRA Archaeology, Palaeontology and Meteorites (APM) Unit requests that the HIA be amended to include a clear impact assessment of the identified heritage resources. It is not clear how these resources will be affected by the proposed mining activities. A map must be provided that shows the location of the heritage resources in relation to the proposed mining activities.

Additionally, a Palaeontological Impact Assessment (PIA) must be conducted by a qualified palaeontologist for the proposed development. The Environmental Impact Assessment (EIA) and all appendices must be submitted to the SAHRIS Case application in order for an informed comment to be issued. The location of the proposed development must be correctly mapped on the GIS Layer of the SAHRIS application to show the boundaries of the Mining Right Application Area.

Further comments will be issued on receipt of the above.

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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Natasha Higgitt  
Heritage Officer  
South African Heritage Resources Agency

# Application for Mining Right on the Farm Palmietfontein 208JP near Pilanesberg

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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/406599>  
(DMR, Ref: REF NW 30/5/1/2/2/2/10115MR)