

Our Ref:



an agency of the
Department of Arts and Culture

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CaseID: 14497

Date: Wednesday March 25, 2020
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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: Miss yvonne gutona

The application area comprises of farms Wolvenfontein 74 IQ, Portions 1 and 2 of the farm Syferfontein 81 IQ, Portion 11 and the Remainder of the farm Modderfontein 187 IP, Portion 91 and 43 of the farm Rooipoort 191 IP, Oatlands 79 IQ, Uitkyk 184 IP, Portion 5 and the remainder of portion 12, the Remainder of portion 44(apportion of 12), Portion 40 a portion of 44 of the farm Palmietfonein 189 IP, Portions 2, 4, 5 and portion 6 (Known as the remainder of Koppieskraal 500 IP, Apportion of Makoskskraal 203 IP, Portions 2, 4, 8 and 10 of the farm Sweethome 197 IP and portion 3 (Portion 1), portion 4 (Portion 3), portion 9, portion 10 and portion 11 of the farm Doorpan 193 IP, Covering approximately 20 263.5 ha. The farm properties are situated near Ventersdorp, North West Province.

Jomela Consulting (Pty) Ltd has been appointed by Rivanet Mining and Exploration Pty Ltd to conduct an Environmental Authorisation Application for proposed mining activities on various properties near Ventersdorp, North West Province (NW30/5/1/1/2/10151 MR).

A Final Environmental Impact Assessment (EIA) Report has been submitted in terms of the National Environmental Management Act, 1998 (NEMA) and the 2014 EIA Regulations for activities that trigger the Mineral and Petroleum Resources Development Act, 2002 (MPRDA)(As amended). The proposed mining right application area will cover approximately 20 263 ha and the activities will include opencast quarrying, hauling of raw material to an existing plant, storage of dangerous goods, 10 km of roads and storm water infrastructure.

Mr. Coetzee was appointed to provide heritage specialist input into the EA process as per section 38(3) and 38(8) of the National Heritage Resources Act, Act 25 of 1999 (NHRA) as required by section 24(4)b(iii) of NEMA.

Coetzee, T. 2020. Phase 1 Archaeological Impact Assessment & Desktop Study for the Rivanet Mining & Exploration.

It is noted that the mining right area was subjected to a desktop assessment in some areas and field-based visits in other areas as noted in Figure 1 of the report. This is due to the proposed phasing of the mining



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activities as described in section 2.2 of the report.

A total of 61 heritage resources were identified within the assessed footprint, as a result of the desktop and physical surveys. A total of 22 buildings and structures were identified that include farmsteads, mining shaft and infrastructure and ruins. The significance of these resources range from low to high as shown in Table 6 of the report. A total of four (4) cemeteries were identified within the proposed development footprint, of which all were rated as sites of high heritage significance. The areas that were not subjected to a field visit are considered to be significant from a heritage perspective, evidenced by the potential heritage sites as shown in Appendix G, and the amount of heritage resources identified as a result of the field assessment.

Recommendations provided in the report include the following:

- It is advised that the mining layout be developed in such a way to exclude as many as possible indicated heritage sites
- Once the proposed mining layout has been confirmed, a qualified archaeologist must conduct a pedestrian survey on the proposed construction and impact footprint prior to mining, construction or development phases and provide supplemental recommendations for the safeguarding of heritage resources. This is recommended due to the high number of heritage sites present on the farm portions;
- The sites dating to between 1944 and 1963 that consist of either intact buildings or ruins are considered significant from a heritage perspective and if possible, should be avoided by the mining layout. Should this not be possible, destruction permits may be applied for, subject to further investigation of the structures required to be demolished;
- Because the general area is associated with historical mining activity, the presence of subsurface cultural material is likely and care should therefore be exercised when developing in these areas;
- Depending on the location of the mining infrastructure and processes, a heritage management plan for the nearby buildings, structures and cemeteries is recommended;
- Because the cemeteries are no longer in use, it is recommended that a fenced-off conservation buffer of 100 m be established around each cemetery, the cemeteries be kept tidy and that the necessary signage be installed. Access to the cemetery must not be refused and the mine ECO should regularly inspect the fence, as well as the graves. Should any additional damage be observed as a result of mining activities, a qualified archaeologist must be contacted to assess the situation to provide further recommendations. Alternatively, the graves may be relocated by a qualified graves relocation unit to a premises earmarked by the local municipality, but will set in motion a substantial process as new legislation will be triggered. These processes, however, must be performed in accordance with the

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involvement of community leaders and the relatives of the deceased buried in the concerned cemeteries;

- Should the need arise to expand the proposed development beyond the surveyed area mentioned in this study, the following applies: A qualified archaeologist must conduct a full Phase 1 Archaeological Impact Assessment (AIA) on the sections beyond the demarcated area that will be affected by the development, in order to determine the occurrence and extent of any archaeological sites and the impact development might have on these sites;
- The general area assessed as part of the desktop study is considered sensitive from a heritage perspective. Therefore, a qualified archaeologist must conduct a full Phase 1 Archaeological Impact Assessment on the areas demarcated for mining prior to the commencement of mining activities.
- A Chance Finds Procedure is recommended to be followed.

The current SAHRIS Case is linked to SAHRIS Case ID 13522

(<https://sahris.sahra.org.za/cases/application-mining-right>). The EAP at the time was DERA Environmental Consultants (Pty) Ltd. A Draft Scoping Report was submitted to SAHRA on this case on the 01/03/2019. SAHRA issued an Interim Comment on the 19/03/2019 requested that an assessment of heritage resources be undertaken, that included an Archaeological Impact Assessment (AIA) and a field-based Palaeontological Impact Assessment (PIA).

Final Comment

The SAHRA Archaeology, Palaeontology and Meteorites (APM) Unit cannot endorse this proposed development as a Final EIA has been submitted, there are no additional timeframe to address SAHRA comments issued in 2019. As such the assessment of heritage resources is incomplete, as a field-based PIA was not completed as part of the EA application. SAHRA advises the Department of Mineral Resources (DMR) to reject the application to mine on various properties near Ventersdorp, North West Province (NW30/5/1/1/2/10151 MR) as the assessment of the impact to heritage resources is incomplete as required by section 38(3) of the NHRA as required by section 24(4)b(iii) of the NEMA.

This comment must be forwarded directly to the competent authorities and proof of the submission and receipt thereof must be provided to SAHRA.

This comment will be reiterated on SAHRIS Case ID 13522

(<https://sahris.sahra.org.za/cases/application-mining-right>) for the record.

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

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above in the case header.

Yours faithfully

Natasha Higgitt
Heritage Officer
South African Heritage Resources Agency

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

ADMIN:

Direct URL to case: <http://www.sahra.org.za/node/530528>
(, Ref: NW30/5/1/1/2/10151 MR)