

**AIA ON A PORTION OF KROONDAL 304JQ FOR THE PROPOSED KROONDAL HERITAGE AND GRAVES ASSESSMENT AT THE GLENCORE KROONDAL MINE, NORTH WEST PROVINCE**

Our Ref:



an agency of the  
Department of Arts and Culture

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CaseID: 14730

Date: Tuesday April 13, 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: Mr Neels Kruger  
Neels Kruger

### **ARCHAEOLOGICAL IMPACT ASSESSMENT (AIA) OF DEMARCTED AREAS ON A PORTION OF KROONDAL 304JQ FOR THE PROPOSED KROONDAL HERITAGE AND GRAVES ASSESSMENT AT THE GLENCORE KROONDAL MINE, NORTH WEST PROVINCE**

Exigo Sustainability has been appointed by Glencore Merafe Venture Operations to conduct a Heritage and Graves Assessment at the Glencore Kroondal Mine, near Kroondal, North West Province.

*Kruger, N. 2020. Kroondal Heritage and Graves Assessment Report.*

A number of graves that were not identified by the original Heritage Impact Assessment (Pistorius, 2010) were fenced off by the mine prior to the construction of a concrete storage yard. A recent claim has noted that additional burial may be present at the site of the storage yard. A Ground Penetrating Radar (GPR) survey was conducted in 2018 which noted anomalies that may be attributed to buried human remains and desktop studies show that large sections of the Kroondal Mine Plant were constructed over an area that used to contain an informal settlement dating to the 1900's. Therefore, it is highly likely that human remains could occur in the areas surrounding the fenced graveyard, including the storage yard.

Additionally, a historical homestead was identified along the rock outcrop north of the storage yard, which is located within the exclusion zone demarcated by the GPR focus area.

Recommendations provided in the report include the following:

- It is primarily recommended that an exclusion zone (demarcated by GPR focus areas) be implemented around the known burials in order to protect any possible previously undetected human burials;
- It is advisable that the storage yard and core shed be decommissioned and included in this exclusion zone in order to ensure the preservation of the site;
- The exclusion zone should be fenced off, access control should be applied and a site notice indicating the heritage status of the site should be erected. A further heritage conservation buffer of 100m, as

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required by SAHRA, should be implemented around the exclusion zone;

- A site management plan detailing strict site management conservation measures should be implemented;
- Should these mitigation measures proved unachievable, the relocation of all burials should be conducted. This measure should be undertaken by a qualified archaeologist, and in accordance with relevant legislation and subject to any local and regional provisions and laws and by-laws pertaining to human remains. A full social consultation process should occur in conjunction with the mitigation of cemeteries and burials (see Addendum 2). Should any additional graves or human remains be encountered in the project area, these should be reported to the Heritage Specialist and relevant authorities (SAHRA) and development activities should be suspended until the site has been inspected by the Specialist;
- As the historical settlement site falls within the recommended exclusion zone (see above), no further action is recommended in terms of heritage mitigation should this zone be effected. However, should the site be impacted in any way, a permit for the destruction of any of the features will be required, subject to terms stipulated in the NHRA;
- Considering the localised nature of heritage remains, the general monitoring of the development progress by an ECO is recommended for all stages of the project. Should any subsurface palaeontological, archaeological or historical material, or burials be exposed during construction activities, all activities should be suspended, and the archaeological specialist should be notified immediately.

## Final Comment

The following comments are issued in terms of section 38(8) of the NHRA in order to amend the Environmental Management Programme (EMPr) of the Kroondal Chrome Mine operations to allow for the management of heritage resources within the development footprint.

The SAHRA Archaeology, Palaeontology and Meteorites (APM) Unit would like to highlight the following information pertaining to the identified historical settlement.

A Late Iron Age site was excavated within the Kroondal Chrome Mine in 2004 (<https://sahris.sahra.org.za/heritage-reports/permitkroondalpelserajmar04>). The settlement was mapped and this map includes as an Appendix to the report, however the Appendix 2 is not on the SAHRIS record. The historical site identified as noted above may be linked to excavated site described in the permit report. It would

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be beneficial for the heritage specialist/applicant to contact the previous permit holder to attain this map, to ascertain if there are links and to understand the age of the site.

Nonetheless, the SAHRA APM Unit provides the following comments with regards to the historical settlement:

- The historical settlement must be included in the exclusion zone. No invasive activities are permitted within this area without appropriate permits issued by SAHRA in terms of section 35 of the NHRA;
- Taking into consideration the previous excavations within this mine complex, should any invasive or construction activities be planned for any area within the 100 m buffer zone as depicted by figure 6-1 in the heritage report, test excavations must be conducted to ensure that no archaeological heritage resources are present. Permits in terms of section 35 of the NHRA must be applied for this prior to testing;
- A Conservation Management Plan (CMP) must be developed and submitted to SAHRA for review. This CMP must consider the results of the previous permitted excavations within the mine complex with regards to management measures and chance finds procedures.

The following comments are provided by the SAHRA Burial Grounds and Graves (BGG) Unit with regards to the burials:

- Test excavation must be conducted at areas inside and outside the storage facility where the presence of graves is suspected. This is to establish the extent of the burial and to assess if the boundaries of the existing fence will need to be extended as part of the mitigation measures. A SAHRA test permit must be obtained for this activity.
- The CMP must indicate the exact number of graves identified and outline conservation management plan for these.

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

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

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**ADMIN:**

Direct URL to case: <https://sahris.sahra.org.za/node/533183>

**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.