



an agency of the
Department of Arts and Culture

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CaseID: 15188

Date: Thursday October 29, 2020

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Final Comment

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

Attention: Bauba A Hlabirwa Mining Investments (Pty) Ltd

PO Box 1658, Witkoppen, 2068

Bauba: Moeijelijk Mine is an existing operation and holds a Mining Right (LP10096MR) and Integrated Environmental Authorisation (LP 10096 (58 MR)) on the farm Moeijelijk 412 KS for the opencast and underground mining of chrome as well as a Water Use Licence (Licence No. 01/B71B/ACGI/5052). Bauba A Hlabirwa Mining Investments (Pty) Ltd proposes to reuse or reclaim the tailings material produced by the existing wash plant on site in order to minimise the residue stockpiled on site and to maximise recycling. Moeijelijk Mine is located on the farm Moeijelijk 412 KS in the Limpopo Province.

Bauba A Hlabirwa Mining Investments (Pty) Ltd: Moeijilik Mine is proposing to mine their existing Tailings Storage Facility (TSF) and backfill the remaining material in order to reduce the stockpile of waste product. As well as establishing two new PCD, new ROM, Overburden dump and two opencast pits in their existing mine right area. The mine is located on Moeijilik 412 KS, in Fetakgomo Tubatse Local Municipality, Limpopo Province.

They have appointed Redkite Environmental Solutions (Pty) Ltd to undertake a Scoping and Environmental Impact Assessment (EIAr) application process in support of an Environmental Authorisation application in terms of the National Environmental Management Act, 1998 (NEMA), as amended and a Mining Right in terms of the Mineral and Petroleum Resources Development Act, 2002 (MPRDA) (As amended), for listed activities in the NEMA EIA Regulations 2014, as amended.

In order to meet the requirements of SAHRA for commenting in terms of section 38(8) of the National Heritage Resources Act, no. 25 of 1999 (NHRA), a Heritage Impact Assessment (HIA) has been submitted to SAHRA for commenting. The HIA was previously submitted to SAHRA in 2018 on case ID 12381 for the mines expansion activities.

Coetzee, T. July 2017. Phase I Archaeological Impact Assessment for Eco Elementum (Pty) Ltd for the proposed expansion of the Moeijelyk Chrome Mine on the remaining extent of the farm Moeijelik 412 KS, Sekhukhune, Limpopo.



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The author undertook a field assessment of the proposed mine right area and mine operations expansion area, and identified 8 heritage sites. Most of these sites are recent maize drying beds which are of low significance. A few isolated potsherd scatters and stone tool scatters were identified within and near watercourse ways, making the context of these artefacts indeterminable and of low significance. The historical sites MX1 and MX3 are sites of medium significance, located outside the area of direct impact. If these sites are threatened by any operations, then the author recommends MX1 and MX3 be recorded via drawings and photographs before a destruction permit is applied for by the relevant heritage authority.

SAHRA issued a Final Comment dated 16/04/2020, stating the following:

SAHRA Archaeology, Palaeontology and Meteorites (APM) Unit accepts the HIA report and the recommendations contained therein. As site MX3 is located outside the mine right area, there are no further requirements necessary for the conservation of this site. Site MX1 must be conserved in situ. As the development is located within an area with negligible palaeontological sensitivity, SAHRA does not require a Palaeontological Impact Assessment.

SAHRA recommends the following additional conditions to be included in the EMP:

- A short heritage management plan/policy must be developed for the continued conservation, monitoring and conservation of MX1.
- If there are any new heritages resources are discovered during construction and operation phases of the proposed development, then a professional archaeologist or palaeontologist, depending on the nature of the finds, must be contracted as soon as possible to inspect the findings at the expense of the developer.
- If the newly discovered heritage resources prove to be of archaeological or palaeontological significance, a Phase 2 rescue operation may be required at the expense of the developer. Mitigation will only be carried out after the archaeologist or palaeontologist obtains a permit in terms of section 35 of the NHRA (Act 25 of 1999). You may contact SAHRA APM Unit for further details: (Nokukhanya Khumalo/Phillip Hine 021 202 8652).
- If any unmarked human burials are uncovered and the archaeologist called in to inspect the finds and/or the police find them to be heritage graves then mitigation may be necessary and the SAHRA Burial Grounds and Graves (BGG) Unit must be contacted for processes to follow (Mimi Seetelo 012 320 8490).

The CMP must also be uploaded to the case once its completed.

All the EIA appendices must be uploaded to the case.

The Final EIA report must be submitted to the case, once it's available for public review. When the Record of Decision is issued, it must also be uploaded to this case.



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As this application will not impact any additional areas then the likely impact to the heritage resources will be the same as the assessed activities in this HIA. An Environmental performance assessment was uploaded to case ID 12381 but the case was never submitted back to SAHRA. The Environmental performance assessment assessed vague heritage outcomes and not the conditions SAHRA requested should be added to the EMPr for monitoring. It is not clear whether MX1 is being consistently monitored for unforeseen potential damage.

Final Comment

SAHRA Archaeology, Palaeontology and Meteorites (APM) Unit accepts the HIA report and the recommendations contained therein. SAHRA's Final Comment conditions still stand as follows:

- As site MX3 is located outside the mine right area, there are no further requirements necessary for the conservation of this site.
- Site MX1 must be conserved in situ and the requested CMP must be submitted to SAHRA. The site must also be monitored so damage does not occur to the site.
- If there are any new heritages resources are discovered during construction and operation phases of the proposed development, then a professional archaeologist or palaeontologist, depending on the nature of the finds, must be contracted as soon as possible to inspect the findings at the expense of the developer.
- If the newly discovered heritage resources prove to be of archaeological or palaeontological significance, a Phase 2 rescue operation may be required at the expense of the developer. Mitigation will only be carried out after the archaeologist or palaeontologist obtains a permit in terms of section 35 of the NHRA (Act 25 of 1999). You may contact SAHRA APM Unit for further details: (Nokukhanya Khumalo/Phillip Hine 021 202 8652).
- If any unmarked human burials are uncovered and the archaeologist called in to inspect the finds and/or the police find them to be heritage graves then mitigation may be necessary and the SAHRA Burial Grounds and Graves (BGG) Unit must be contacted for processes to follow (Thingahangwi Tshivase/Mimi Seetelo 072 802 1251).

The Final EIA report must be submitted to the case, once it's available for public review. When the Record of Decision is issued, it must also be uploaded to this case.

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

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Yours faithfully

Nokukhanya Khumalo
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/537679>

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.