



an agency of the
Department of Arts and Culture

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CaseID: 15475

Date: Wednesday March 02, 2022

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Final Comment

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

Attention: Prescali Info

Prescali Environmental Consultants (pty) Ltd

EIA/EMPr for the Proposed Waste Rock Dump expansion, Tailings Storage Facility and Associated Infrastructure at Tweefontein Section (LP30/5/1/2/3/2/1(214) EM) for Samancor Chrome Limited Eastern Chrome Mines located on: Portions 1, 3(RE), 4, 5(RE), 6 and 9 of the Farm Tweefontein 360 KT, Fetakgomo Tubatse Local Municipality, Limpopo Province

Samancor is proposing an expansion of their opencast, underground, Waste Rock Dump expansion, Tailings Storage Facility(TSF) areas located on Portions 1, 3(RE), 4, 5(RE), 6 and 9 of the Farm Tweefontein 360 KT, in Fetakgomo Tubatse Local Municipality, Limpopo Province.

They have appointed Gudani Consulting Environmental and Social Scientist (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 section 22 of the Mineral and Petroleum Resources Development Act, 2002 (MPRDA) (As amended), for listed activities in the NEMA EIA Regulations 2014, as amended.

A Scoping Report was submitted to SAHRA in terms of section 38(8) of the National Heritage Resources Act, 25 of 1999 for commenting.

The Scoping report states that an Archaeological Impact Assessment will be undertaken and the reports will be available for comment during the EIA public review period.

An Archaeological Impact Assessment was undertaken by APelser Archaeological Consulting cc on 25/01/2020.

Pelser, A. September 2020. A Phase 1 AIA Report for the Sylvania Tweefontein Expansion Project near Steelpoort, Limpopo Province.

The author undertook a field assessment of the TWF1 mining area and the TWF3 area, for the TWF3 mining area, no sites were identified, this area is currently being mined and any heritage resources located there will



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have been destroyed long ago. One site was identified within TWF1 mining area, one more was identified just outside the boundaries of TWF1 mining area and the last site was identified within close proximity of TWF1 mining area. The author recommends the following:

- Detailed mapping of the TWF1 area and the related erosion donga in order to determine the extent of the archaeological deposit and sites located here.
- The sampling of surface material dating to the Stone Age and Iron Age. For this an archaeological permit will be required from SAHRA.
- The excavation of surface features dating to the Iron Age (such as Site 3) in order to determine the age of and extent of the Iron Age in the study area. A permit from SAHRA will have to be obtained for this purpose as well.

The SAHRA initially requested that the EAP assess whether a Palaeontological Impact Assessment is required for the proposed development by uploading a .kml file to the case under the palaeosensitivity map on SAHRIS. An Interim Comment and a Letter was issued dated 08/03/2021 and 14/04/2021 requesting the submission of a .kml file of the proposed development area as well as the submission of the environmental documents. The .kml file was submitted, and the draft EIAR was submitted on 29/09/2021 and additional documents were submitted on 14/02/2022.

Final Comment

The South African Heritage Resources Agency (SAHRA) Archaeology, Palaeontology and Meteorites (APM) Units accepts the AIA report submitted to the case for commenting, and the recommendations provided therein. The development area does not require an assessment of impacts to palaeontological heritage. The SAHRA has no objection to the development going ahead on the following conditions:

A suitably qualified archaeologist must be appointed for the mitigation of Sites 1-3 prior to the commencement of mining at TWF 1. The appointed archaeologist must apply to the SAHRA for a section 35(4) permit application in terms of NHRA and Chapter IV NHRA Regulations.

In the event that fossils are uncovered during construction then construction must cease within the immediate vicinity, a buffer of 30 m must be established, and a palaeontologist called in to inspect the finds. The palaeontologist must obtain a section 35(4) permit in terms of NHRA and Chapter IV NHRA Regulations, before any fossils are collected.

Samancor- Eastern Chrome Mine-Waste Rock Expansion and Tailings Storage Facility

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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 8654).

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 Tshivhase/Ngqalabutho Madida 012 320 8490).

The Final EIAR and its appendices must be submitted to the case and once a Record of Decision from the competent authority is issued, it must also be submitted to the case.

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

Yours faithfully

Nokukhanya Khumalo
Heritage Officer
South African Heritage Resources Agency

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Phillip Hine

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

ADMIN:

Direct URL to case: <https://sahris.sahra.org.za/node/539757>

(, Ref:)

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.