



an agency of the  
Department of Arts and Culture

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South African Heritage Resources Agency | 111 Harrington Street | Cape Town  
P.O. Box 4637 | Cape Town | 8001  
[www.sahra.org.za](http://www.sahra.org.za)

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CaseID: 15890

Date: Thursday January 21, 2021

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## **Interim Comment**

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

Attention: Cuchron (Pty) Ltd

174 Veale Street, Nieuw Muckleneuk, Pretoria 0181 P.O. Box 96023, Waterkloof Village 0146

**The project name is the Steamboat Project, located on the farm's Steamboat 306MR and Inkom 305MR, covering an area of 1,453 hectares, situated along the Mogalakwena River in the Province of Limpopo. Steamboat Graphite will establish a Beneficiation Plant in proximity to the mine, to beneficiate and process the graphite for a broader market. A Mining Right Application has been submitted by Cuchron for the mine development, and acceptance was received on 12 November 2020. Two Environmental Authorisation Applications has been submitted: • Cuchron has applied for Environmental Authorisation for the Mine Development and Associated Infrastructure • Steamboat Graphite has applied for the Environmental Authorisation for the Beneficiation Plant and associated infrastructure. Approval has been received from DMR to follow a joint and consolidated approach to the Environmental Impact Assessment Process, and produce combined reports for the two applications as envisaged in terms of Regulation 11(4) of the EIA regulations 2014 The projects will require the following footprints: a) Mining Open Pit and Associated infrastructure: 14ha (1% of properties); and b) Beneficiation Plant and Associated infrastructure: 13ha (1% of properties). The combined size of the two projects are 27ha in total.**

Cuchron (Pty) Ltd Steamboat Graphite (Pty) Ltd are proposing to convert their existing prospecting right over the farms Steamboat 309 MR and Inkom 307 MR into a mining right for both farms over an area of 1 453 hectares. They are proposing to mine graphite and construct a beneficiation plant in the mine right area.

Diphororo Developments (Pty) Ltd have been appointed to undertake an environmental assessment as part of the Scoping and Environmental Impact Reporting process in support of an Environmental Authorisation (EA) in terms of the National Environment Management Act, Act 107 of 1998 (NEMA) for activities that trigger the NEMA EIA 2014 Regulations. As well as an Environmental Management Plan as per the requirements of the Minerals and Petroleum Resources Development Act, No 28 of 2002 (MPRDA)(As amended).

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

# CUCHRON MINING RIGHT APPLICATION (CUCHRON (PTY) LTD) AND A MINERAL BENEFICIATION PLANT (STEAMBOAT GRAPHITE (PTY) LTD)

Our Ref: 15890



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## Interim Comment

As the proposed development is undergoing an EA Application process in terms of the National Environmental Management Act, 107 of 1998 (NEMA), NEMA Environmental Impact Assessment (EIA) Regulations for activities that trigger the Mineral and Petroleum Resources Development Act, No 28 of 2002 (MPRDA) (As amended), it is incumbent on the developer to ensure that a Heritage Impact Assessment (HIA) is done as per section 38(3) and 38(8) of the National Heritage Resources Act, Act 25 of 1999 (NHRA). This must include an archaeological component, palaeontological component and any other applicable heritage components. The HIA must be conducted as part of the EA Application in terms of NEMA and the NEMA EIA Regulations.

The archaeological component of the HIA should follow the SAHRA 2007 Minimum Standards: Archaeological Component of Impact Assessment Report. The quickest process to follow for the archaeological component would be to contract a qualified archaeologist (see [www.asapa.co.za](http://www.asapa.co.za) or [www.aphp.org.za](http://www.aphp.org.za)). The Minimum Standards refers to a Letter of Recommendation for Exemption from further studies, that may be submitted should the archaeologist deem it appropriate.

The proposed development area is located within an area of moderate sensitivity and insignificant sensitivity as defined in palaeo map policy on SAHRIS. A desktop Palaeontological Impact Assessment (PIA) must be undertaken by a qualified palaeontologist (See <https://www.palaeosa.org/heritage-practitioners.html> for a list of qualified palaeontologists). The report must comply with the 2012 Minimum Standards: Palaeontological Components of Heritage Impact Assessments.

Any other heritage resources as defined in section 3 of the NHRA that may be impacted, such as built structures over 60 years old, sites of cultural significance associated with oral histories, burial grounds and graves, graves of victims of conflict, and cultural landscapes or views must also be assessed.

Further comments will be issued upon receipt of the requested.

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

Yours faithfully

**CUCHRON MINING RIGHT APPLICATION (CUCHRON (PTY) LTD) AND A  
MINERAL BENEFICIATION PLANT (STEAMBOAT GRAPHITE (PTY) LTD)**

**Our Ref: 15890**



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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/548145>  
(, Ref: LP 30/5/1/2/3/2/1(10193)MR)