



an agency of the  
Department of Arts and Culture

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CaseID: 15890

Date: Thursday July 22, 2021

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## **Final 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).

The SAHRA issued an Interim Comment dated 21/01/2021 noting that the PIA and HIA reports will be undertaken in the EIA phase. The reports were submitted on 14/07/2021.

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

Our Ref: 15890



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*Van Schalkwyk, J. April 2021. The Phase 1 Heritage Impact Assessment for the Cuchron Mine Development and Steamboat Beneficiation Development.*

The author undertook a field survey of the proposed mining area and identified various heritage resources. In some portions of the study area there is a low density surface scatter of stone tools. A single informal grave marked with circular stones was also identified, this site is of local high significance. Some historical mining possibly dating to the 1980's was also identified however, they look older than the 80's due to the vegetation and tree cover. The author recommends the following:

No further mitigation for site 7.1.1 the stone tool surface scatter.

The single grave (site 7.3.1) should be retained in situ, a bufferzone of 20m must be adhered to.

An archaeological investigation, mitigation of site 7.3.2. to know more on the historical mining activities here.

*Fourie, H. March 2021. Desktop Palaeontological Assessment for the Cuchron Mine Development and Steamboat Beneficiation Development.*

The proposed development is located in a moderate palaeo-sensitive area according to the SAHRIS palaeomap, and as per the SAHRIS palaeomap policy, a desktop study was submitted. The study area is underlain by palaeontological insignificant gneiss and igneous rocks of the Beit Bridge Complex, Limpopo Belt, the graphite will be mined here. The area is capped by Quaternary aged sediments of moderate palaeontological sensitivity, which has a rare occurrence of fossilised mammalian bone and teeth, toitoise remains, marine non-mollusc shells. The author recommends the following:

If any palaeontological material is exposed during digging, excavating, drilling or blasting, SAHRA must be notified. All development activities must be stopped, a 30 m no-go barrier constructed and a palaeontologist should be called in to determine proper mitigation measures.

## Final Comment

The SAHRA Archaeology, Palaeontology and Meteorites (APM) accepts the HIA and PIA reports and the recommendations contained therein. The SAHRA has no objection to the development going ahead on the following conditions:

A section 34 permit application must be applied for to the Limpopo Provincial Heritage Resources Authority by an archaeologist, in order to obtain a section 34 permit in terms of NHRA and Chapter IV NHRA Regulations



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before any mitigation of the historical remains begins.

If fossil remains or trace fossils are discovered during any phase of construction and mining, either on the surface or exposed by excavations the Environmental Officer (EO) in charge of these developments must be informed. These discoveries ought to be protected and the ECO must report to SAHRA.

A Chance Finds Fossil Procedures under appendix 2 must be included in the EMPr.

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.

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).

The Burial Grounds and Graves (BGG) Unit accepts the recommendations provided in the HIA report. A social consultation process in terms of Chapter XI of the NHRA Regulations, must be carried out to identify the descendants of the burial and to obtain permission to fence in the burial with a 30m buffer zone. If the mine is unable to retain the grave *in situ* the permission must be obtained from the families of the deceased, if they agree to the relocation of their graves then a section 36 of the NHRA permit application must be logged on SAHRIS.

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).

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The Final EIA 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

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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)

**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.