

Our Ref:



an agency of the  
Department of Arts and Culture

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South African Heritage Resources Agency | 111 Harrington Street | Cape Town  
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Enquiries: Natasha Higgitt  
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CaseID: 16100

Date: Thursday March 10, 2022  
Page No: 1

## Final Comment

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

Attention: Assmang (Pty) Ltd

**Beeshoek Iron Ore Mine (hereafter referred to as “the Mine” or “Beeshoek”) is actively investigating opportunities for the continued and sustainable mining of iron ore reserves within the approved Mining Right Area (MRA). This application for Environmental Authorisation specifically gives effect to that. Beeshoek Iron Ore Mine is situated approximately 7 km west of the town of Postmasburg, in the Northern Cape Province. The mine is situated under the jurisdiction of the Tsantsabane Local Municipality, under the ZF Mgcawu District Municipality. The regional R385 road, as well as the OREX Railway Line traverses the mine. The proposed new mining activities are located on the following Farms: Portion 0 of the farm Beesthoek 448 RD (1,543ha), Portion 1 of the farm Beesthoek 448 RD (1,231ha) and Portion 4 of the farm Olynfontein 475 RD (2,168ha)**

EnviroGistics (Pty) Ltd has been appointed by Assmang (Pty) Ltd: Beeshoek Iron Ore Mine to conduct an Integrated Environmental Authorisation (EA) Application for proposed amendments to the existing Mining Right at the Beeshoek Mine, near Postmasburg, Northern Cape Province (Ref: 223MRC).

A draft Scoping Report and has been submitted in terms of the National Environmental Management Act, 1998 (NEMA) and the 2017 EIA Regulations for activities that trigger the Mineral and Petroleum Resources Development Act, 2002 (MPRDA)(As amended). The proposed amendments include amendments to certain conditions identified during EMPr audits, amendments to the design of existing Waste Rock Dumps (WRDs) which will extend their footprints, the increase of the open cast pit footprint areas, beneficiation plant optimisation and the development of supporting infrastructure such as powerline, roads, pipeline and improvements to storm water management systems.

The DSR notes that an assessment of the impact to heritage resources will be conducted as part of the EIA phase of the EA application.

In an Interim Comment issued on the 12/03/2021, SAHRA notes the pending heritage assessments and provided guidance on what the assessments should contain. Since the issuing of the comment, the assessment of heritage resources and the draft EIR have been uploaded to the case (23/09/2021).



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*Bamford, M. 2021. Palaeontological Impact Assessment for the revised Beeshoek Iron Ore Mine TRF and railway siding, west of Postmasburg, Northwest (sic) Province*

The proposed railway line and siding is underlain by Quaternary Kalahari sands, alluvium and calcrete. No fossil bearing palaeo-pans are present. A Fossil Chance Finds Procedure is recommended to be included in the EMPr.

*Van der Walt, J. 2021. Heritage Impact Assessment for the Proposed Beeshoek Railway Line Link, Postmasburg, Northern Cape Province.*

A total of two (2) heritage resources were identified within the proposed development footprint. These include one isolated possible Acheulean bifacial lithic of low heritage significance and one low-density surface scatter of Middle Stone Age and Later Stone Age informal and formal lithics, of low heritage significance. No mitigation measures are recommended. A Chance Finds Procedure is recommended to be implemented.

*Van der Walt, J. 2021. Heritage Impact Assessment for the Proposed Beeshoek Mine Optimisation Project, Postmasburg, Northern Cape Province.*

A total of 27 heritage resources were identified as part of the HIA which include single, isolated Stone Age lithics, low-density surface scatters of Stone Age lithics, possible historic pits, modern concrete slabs, possible grave, structures, mud brick ruins and two cemeteries.

The HIA refers to a Palaeontological Assessment conducted in March 2021, however, no report has been submitted to the case for review.

Recommendations provided in the report include the following:

- Implementation of a chance find procedure for the project;
- It is recommended that the Strategic exploration area should be subjected to a heritage walk through prior to development;
- The presence of graves should be confirmed during social consultation (BH4, BH19, BH22 and BH23). The area should be monitored during construction;
- Graves and cemeteries (BH26 and BH27) should be retained in situ with access for family members and a sufficient buffer zone;



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- Although unlikely, the recorded stone cairns (BH12, BH21 and BH24) could represent graves and should be confirmed during the social consultation process.

An Interim Comment was issued on the 27/09/2021, requesting that the Palaeontological Assessment conducted in March 2021 for the Optimisation Project be submitted for review and comment before further comments may be issued. Since the issuing of the Interim Comment, the PIA has been submitted (02/03/2022).

*Bamford, M. April, 2021. Palaeontological Impact Assessment for the proposed Beeshoek Mine Optimisation Project, just west of Postmasburg, Northern Cape Province.*

The proposed optimisation and expansion development is underlain on the disturbed eastern margin of the mine area by highly sensitive rocks of the Campbell Rand Subgroup that may preserve stromatolites. Quaternary Kalahari sands, alluvium and calcrete are located on the western side, however, no palaeo-pans are present that may contain fossils. A Fossil Chance Finds Procedure should be added to the EMPr.

## Final Comment

The following comments are made as a requirement in terms of section 3(4) of the NEMA Regulations and section 38(8) of the NHRA in the format provided in section 38(4) of the NHRA and must be included in the Final EIA and EMPr:

- 38(4)a – The SAHRA Archaeology, Palaeontology and Meteorites (APM) Unit and Burial Grounds and Graves (BGG) Unit has no objections to the proposed development;
- 38(4)b – The recommendations of the specialists are supported and must be adhered to. Further additional specific conditions are provided for the development as follows:
  - APM Unit conditions: A report of the recommended walk-through of the Strategic exploration area must be submitted to SAHRA prior to any construction for comment. No construction may occur without comment from SAHRA in this regard;
  - BGG Unit conditions: Identified grave sites must be preserved *in-situ* with a 100m buffer-zone;
  - A Heritage Management Plan (HMP) must be developed for management of all identified heritage sites;
- 38(4)c(i) – If any evidence of archaeological sites or remains (e.g. remnants of stone-made structures, indigenous ceramics, bones, stone artefacts, ostrich eggshell fragments, charcoal and ash concentrations), fossils or other categories of heritage resources are found during the proposed

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development, SAHRA APM Unit (Natasha Higgitt/Phillip Hine 021 462 5402) must be alerted as per section 35(3) of the NHRA. Non-compliance with section of the NHRA is an offense in terms of section 51(1)e of the NHRA and item 5 of the Schedule;

- 38(4)c(ii) – If unmarked human burials are uncovered, the SAHRA Burial Grounds and Graves (BGG) Unit (Thingahangwi Tshivhase/ Ngqalabutho Madida 012 320 8490), must be alerted immediately as per section 36(6) of the NHRA. Non-compliance with section of the NHRA is an offense in terms of section 51(1)e of the NHRA and item 5 of the Schedule;
- 38(4)d – See section 51(1) of the NHRA regarding offenses;
- 38(4)e – The following conditions apply with regards to the appointment of specialists:
  - i) If heritage resources are uncovered during the course of the development, a professional archaeologist or palaeontologist, depending on the nature of the finds, must be contracted as soon as possible to inspect the heritage resource. If the newly discovered heritage resources prove to be of archaeological or palaeontological significance, a Phase 2 rescue operation may be required subject to permits issued by SAHRA;
  - The Final EIA and EMPr must be submitted to SAHRA for record purposes;
  - The decision regarding the EA Application must be communicated to SAHRA and uploaded to the SAHRIS Case application.

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/557759>  
(DMR - NC, Ref: 223MRC)

**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.