



an agency of the
Department of Arts and Culture

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CaseID: 18231

Date: Friday August 19, 2022

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Final Comment

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

Attention: Samancor Chrome - Eastern Chrome Mines

Mareesburg Chrome Mine comprises of the farm Mareesburg 8 JT situated in the Steelpoort area. The portions are as follows: Portion 0 of the Farm Mareesburg 8 JT (RE Extent); Portion 1 of the Farm Mareesburg 8 JT; Portion 2 of the Farm Mareesburg 8 JT; Portion 6 of the Farm Mareesburg 8 JT; and Portion 7 of the Farm Mareesburg 8 JT. This farm lies within the provincial boundaries of the Limpopo Province, and falls within the Sekhukhune District Municipality of the Limpopo Province, approximately 34km south-west of Steelpoort and 32km west of Lydenburg.

Samancor (Pty) Ltd Mareesburg Chrome Mine have appointed Environmental Assurance (Pty) Ltd to undertake an environmental assessment as part of the Basic Assessment application 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 the requirements of the Minerals and Petroleum Resources Development Act, No 28 of 2002 (MPRDA)(As amended).

Mareesburg Chrome Mine will be an opencast and underground chrome 980.3 ha in extent and targeting the middle group chromitite seams. The opencast area including 191 ha in extent.

A Heritage Impact Assessment (HIA) 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).

Coetzee, T. February 2022. Phase 1 Archaeological Impact Assessment for the Proposed ECM Mareesburg Mining Development on Portions of the Farm Helena 6 JT and Mareesburg 8 JT, Steelpoort, Limpopo.

The author undertook a field assessment of the proposed development area and identified various sites of heritage significance, however, the report mainly assesses sites within the opencast zone. Sites K09 & K10 are Later Iron Aged (LIA) sites consisting of upper and lower grinding stones and dilapidated stone walling. Both these sites are unrelated to the LIA stonewalled sites of the region and they are both sufficiently recorded in this report. An MSA scraper was identified as site K06, and site K01 is a ploughshare with bricks, both these



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sites are sufficiently recorded in the report. Site K03 is a stone cairn and site K02 is a potential grave site located in the underground mine section. Site K03 is located on top of bedrock and is unlikely to demarcate a burial, this site is sufficiently recorded in the report. There are two areas in the proposed opencast section that are designated sensitive areas because of the clusters of stonewalled enclosures with some potsherds visible on the surface. Sensitive area 1 is 4.9 ha in extent and Sensitive area 2 is 23.5 ha in extent. Sites Sites K04, K05, K07, K08 are MSA and an ESA stone tools located in sensitive area 2.

The author recommends the following to be implemented throughout the life of the mine:

Site K02 must be conserved *in situ* with a 10m buffer zone and it must be fenced.

Sensitive areas 1 and 2 should be conserved *in situ*, if the mine is unable to then they must be mitigated. If the sites are to be mitigated then an archaeologist must map the sites in detail, test pits will have to be made to determine the depth of any archaeological deposits, and a sample of MSA and ESA stone tools to be collected.

If any surface activities in the underground mining section then an archaeologist must be appointed to inspect the area and a report compiled.

The chance finds procedure must be implement by the ECO and they must be included in the EMPr.

It should be noted that the development area is underlain by geological strata that has negligible palaeontological significance and according to the palaeomap policy no studies are required.

The SAHRA issued an Interim Comment dated 13/06/2022 requesting the submission of the environmental documents before providing further comments. The documents were submitted on 21/06/2022, along with a letter from the EAP confirming that the applicant will adhere to the recommendations in the HIA report.

Final Comment

The SAHRA Archaeology, Palaeontology, and Meteorites (APM) Unit notes and accepts the submission of the draft EIAR, and HIA reports. SAHRA has no objections to the proposed development on the following conditions:

Sensitive areas 1 and 2 should be conserved *in situ*, and if the mine is unable to do so, they must be mitigated. If the sites are to be mitigated, an archaeologist must map the sites in detail, test pits will have to be made to determine the depth of any archaeological deposits, and a sample of MSA and ESA stone tools to be collected.

If any surface activities occur in the underground mining section then an archaeologist must be appointed to inspect the area and a report must compiled and submitted to this case on SAHRIS. Such a report must be

Samancor ECM MR, EA and WML Application for the proposed Mareesburg Mine

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submitted to SAHRA for commenting.

If the mine decides to mitigate sites in the areas identified as sensitive, a section 35(4) permit in terms of the NHRA and Chapter IV NHRA Regulations must be applied for, for mitigation of those sites.

In the unlikely 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 and endorses the recommendations for the burial grounds (Site K06) identified in the HIA report. The recommendation includes fencing the site and implementation of a buffer zone of 10m. Before fencing of any burials may occur, permission from the family members must be sought. This must be done by undertaking a social consultation process to identify the family members of the site.

If the mine is unable to retain the grave (Site K06) in situ then it will have to be relocated in terms of section 36(4) and Chapter IX of the NHRA Regulations and section 36(3) of the NHRA.

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).

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.

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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: <https://sahris.sahra.org.za/node/594522>
(, Ref: LP 30/5/1/2/3/2/1 (10219) EM)

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.