



an agency of the  
Department of Arts and Culture

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CaseID: 18532

Date: Tuesday July 26, 2022

Page No: 1

## Final Comment

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

Attention: Miracle Upon Miracle Investments (Pty) Ltd

**Miracle Upon Miracle Investment Preferent Prospecting Right Project on farm Nooitverwacht 324 KT and Eerstegeluk 327 KT, which are located within the Greater Tubatse Local Municipality, Limpopo province. The Prospecting Right was issued by the Department of Mineral Resources and Energy in 2011. The 2011 approved Environmental Management Plan indicated that an Archeological study had to be conducted prior the commencement of exploration activities. Therefore a Phase 1 Cultural Heritage study was conducted because prospecting activities are due to commence in June 2022.**

Miracle Upon Miracle Investments (Pty) Ltd as a holder of a Prospecting Right in terms of the Minerals and Petroleum Resources Development Act, No 28 of 2002 (MPRDA)(As amended), has submitted a Heritage Impact Assessment (HIA) as a condition of the right issued in 2011.

The Chrome, Copper, Cobalt, Silver, Gold, Nickel and other Platinum Group Metals ore exploration prospecting work programme includes the drilling of 75 boreholes.

Mincon (Pty) Ltd has been appointed to oversee the implementation of the EMP and the appointment of the heritage practitioner. The HIA 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).

*van Schalkwyk, J. April 2022. Phase 1 Cultural Heritage Impact Assessment: THE BENGWENYAMA PGM EXPLORATION PROJECT ON THE FARMS EERSTEGELUK 327KT AND NOOITVERWACHT 324KT, STEELPOORT REGION, GREATER SEKHUKHUNE DISTRICT MUNICIPALITY, LIMPOPO PROVINCE.*

The author undertook a field assessment of the prospecting right area and identified a general low density scatter of potsherds in a few areas, as well as low density scatter of MSA stone tools. A historical homestead consisting of stonewalled settlement and some pottery (site BHINFD/04) with a graveyard in close proximity was identified. Two other historical homesteads with the remains of dilapidated house and a perimeter fence were identified as sites BHINFD/010 and BHINFD/011. Site BHINFD/08 is a burial site and site BHINFD/06 consist of a scatter of decorated potsherds of the Mareteng Facies and a background scatter of MSA stone tools. The overall impact is low, but the access roads may have an indirect impact on the identified sites. The



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Page No: 2

local who has knowledge of the identified sites must provide guidance to avoid any unforeseen damage. The author recommends the following:

- Establish buffer zone of 50m from the outer edges of the burial site. Demarcate for period of drilling with danger tape.
- Avoid site. Probably only indirect impact by of making access road. Knowledgeable person such as January Nkosi should assist in determining access road in order to avoid features. Alternative would be full archaeological excavation.

The SAHRA issued an Interim Comment dated 08/06/2022 requesting the HIA to be amended to include the a map with a tracklog. The amended report was submitted on 13/06/2022 with the requested tracklog map added to page 10 of the report. The SAHRA notes that the proposed drilling locations are indicated on the tracklog map.

## Final Comment

The SAHRA Archaeology, Palaeontology, and Meteorites (APM) Unit notes and accepts the submission of the EMP and HIA report. SAHRA has no objections to the proposed prospecting work programme and proposed drilling pads on the following conditions:

Sites BHINFD/06, BHINFD/010 and BHINFD/011 must be avoided with a 30 m buffer zone around them.

A 30m buffer zone must be adhered to for all identified sites in the HIA report including the historical settlements and low density surface scatter of potshered and MSA stone tools.

If the 30m buffer zones cannot be maintained or adhered to then an archaeologist must be appointed to undertake any mitigation of the identified sites, and they must obtain a section 35(4) permit in terms of NHRA and Chapter IV NHRA Regulations, before any fossils are collected.

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 discovered during construction and operation phases of the proposed

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Page No: 3

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.

The Burial Grounds and Graves (BGG) Unit accepts the recommendations for the burial grounds identified in the HIA report and endorses the recommendation of temporary demarcation of the identified burial grounds particularly sites Sites BHINFD/06 and BHINFD/08. The SAHRA BGG unit also endorses the recommendation for the adherence of a 50m bufferzone around the identified burials grounds.

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).

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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Date: Tuesday July 26, 2022

Page No: 4

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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/597254>  
(, Ref: LP30/5/1/1/3/2/1(002)PPR)

**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.