



an agency of the  
Department of Arts and Culture

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CaseID: 21182

Date: Friday August 18, 2023  
Page No: 1

## **Final Comment**

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

Attention: Kgopong Mining (Pty) Ltd

PO Box 1959, Polokwane, 0700

**It is proposed that calcrete aggregate be mined at the operation. Mining at the Kgopong Mining Quarry will be conducted by means of opencast mining methods. Topsoil will be stripped and stockpiled separately to be used for rehabilitation purposes. The calcrete aggregate will be drilled and blasted. A front-end loader will load the blasted material on a dumper to transport the material to a mobile crusher; a front-end loader will also be used to load the crushed material onto trucks which will transport it to the stockpiling area from where it will be distributed to where required. The mine will operate for two (2) year permit period with an option to renew for three (3) periods, each of which may not exceed one (1) year if the mining programme is not completed.**

Kgopong Mining (Pty) Ltd have appointed Bateleur Environmental & Monitoring Services (Pty) Ltd to undertake a Basic Assessment application process in support for an Environmental Authorisation (EA) in terms of the National Environmental Management Act, Act no 107 of 1998 (NEMA) as amended, and in terms of the Mineral and Petroleum Resources Development Act, 2002 (Act No 28 of 2002) (MPRDA), for activities that trigger the NEMA Environmental Impact Assessment (EIA) 2014 Regulations, as amended.

Kgopong Mining is proposing to establish a 5 ha quarry to mine calcrete aggregate located on portions of Portions 12 & 13 of the farm Harriets Wish 393LR, in the Blouberg Local Municipality of the Capricorn District Municipality, Limpopo Province. The listed activities include site clearing to establish a stockpile area; removal of topsoil and overburden and stockpiling; site establishment, including the establishment of an access route, mobilisation of equipment and preparation of area for mining; excavation of an open pit; blasting; Loading zone, loading and dust control; Crushing and screening of aggregate; hauling and transporting of aggregate; ablution facilities, waste storage area; rehabilitation of site.

A Heritage Impact Assessment report by Archætnos cc has been submitted to SAHRA for commenting in terms of section 38 of the National Heritage Resources Act, no. 25 of 1999 (NHRA). A related case (case id 21183) has been created for a mining permit on portion 3 of the farm Harriets Wish.

*van Vollenhoven. A. September 2022. A REPORT ON A CULTURAL HERITAGE IMPACT ASSESSMENT*



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***DONE FOR PROPOSED QUARRIES ON THE FARM HARRIET'S WISH 393 LR, PORTIONS 12 AND 13, FORMING PART OF THE PLATINUM GROUP METALS WATERBERG PROSPECTING AREA, LIMPOPO PROVINCE.***

The author undertook a field assessment of the proposed mine permit area, and did not identify any heritage resources in the study area. There will be no impacts from this current mine permit area (Portion 12 and 13) to known heritage resources. Portion 3 which is outside this application area identified a single grave (Site 01), and an isolated low density scatter of Middle Stone Aged (MSA) stone tools (Site 2). Site 2 is of low significance and is sufficiently recorded in the HIA report, Site 1 is of High local significance and the quarry mining area must be amended in order to retain the site *in situ* with a buffer zone of 30m. Due to the medium to high sensitivity of the heritage landscape, the author recommends chance finds procedures to be implemented during construction and excavation activities.

The SAHRA issued an Interim Comment dated 05/07/2023 requesting an assessment of palaeontological resources by a suitably qualified palaeontologist, and the report to be submitted to SAHRA for commenting.

*Fourie, H. July 2023. Harriets Wish Quarrying Project Waterberg Local Municipality, Capricorn District Municipality, Limpopo Province. Farm: Harriets Wish 393 LR, Palaeontological Impact Assessment: Desktop Study.*

Most of the study area is underlain by Quaternary Aged scree and alluvium, the south western parts of the study area are underlain by gabbro, norite and granite from the Rustenberg Layered Suite, Bushveld Igneous Complex. The alluvium has a moderate palaeontological significance, and the igneous rocks are of negligible palaeontological significance.

Threats are earth moving equipment/machinery (for example haul trucks, front end loaders, excavators, graders, dozers) during construction, the sealing-in, disturbance, damage or destruction of the fossils by development, vehicle traffic, quarrying, and human disturbance.

Special care must be taken during clearing, ground-breaking, digging, drilling, blasting and excavating of foundations, trenches, channels and footings and removal of overburden not to intrude fossiliferous layers. The author recommends the following:

1. The Environmental Control Officer must familiarise him- or herself with the formations present and its fossils and follow protocol and meet with Site Manager regularly.
2. The ECO together with the mine geologist must survey for fossils before and or after clearing, groundbreaking, digging, drilling or excavating with a weekly or bi-weekly audit.



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CaseID: 21182

Date: Friday August 18, 2023

Page No: 3

3. The EMPr will cover the conservation of heritage and palaeontological material that may be exposed during construction activities. For a chance fossil find, the protocol is to immediately cease all construction activities, construct a 30 m no-go barrier, and contact SAHRA for further investigation. Detailed procedures are in the report under appendix 2.

### **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 BAR and EMPr:

38(4)a – The SAHRA Development Applications Unit (DAU) has no objections to the proposed development;

38(4)b – The recommendations provided by the heritage specialists are supported and must be adhered to.

The following additional specific conditions are:

The Fossil Chance Finds Procedures must be included in the EMPr for implementation as per the recommendations of the PIA (appendix 2);

A 100m no-go buffer zone around site Site 01 must be adhered at all times;

If the mine is unable to retain Site 01 *in situ* then a social consultation process as regulated in terms of Chapter XI of the NHRA must be carried out to identify the next of kin to obtain their permission for relocation; Any grave relocations must be undertaken by a qualified archaeologist.

A section 36 of the NHRA permit application in terms of Chapter XI of the NHRA 2000 Regulations must be applied for by a suitably qualified archaeologist.

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 development, SAHRA DAU (Nokukhanya Khumalo/Natasha Higgitt 021 202 8660) must be alerted as per section 35(3) of the NHRA. Non-compliance with section of the NHRA is an offence 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 DA Unit (Nokukhanya Khumalo/Natasha Higgitt 021 202 8660), must be alerted immediately as per section 36(6) of the NHRA. Non-compliance with section of the NHRA is an offence 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;

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



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CaseID: 21182

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Page No: 4

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 BAR 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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Nokukhanya Khumalo  
Heritage Officer  
South African Heritage Resources Agency

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Natasha Higgitt  
Manager: Development Applications Unit  
South African Heritage Resources Agency

**ADMIN:**

Direct URL to case: <https://sahris.sahra.org.za/node/616681>  
(, Ref: LP30/5/1/3/2/11955MP)

**Terms & Conditions:**



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Page No: 5

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.