



an agency of the  
Department of Arts and Culture

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CaseID: 21384

Date: Tuesday August 15, 2023  
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## Interim Comment

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

Attention: Bokoni Platinum Mine

**The proposed Expansion Project will consist of the following new activities and associated infrastructure which will be placed within the existing mining right (MR) and surface lease areas of BPM. • Open pit areas: UG2 pits and Merensky pits; • Additional pollution control dams/settling dams: associated with the open pits, where needed; • Waste rock dumps: to be located near the open pit areas; • Supporting infrastructure: Contractor's laydown areas, site offices, water management structures, access and haul roads, pipelines and powerlines and associated infrastructure**

African Rainbow Minerals (ARM) (Pty) Ltd Bokoni Platinum Mine have appointed SRK Consulting (Pty) Ltd to undertake a Scoping & Environmental Impact 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.

ARM is proposing two projects, the Early Start-Up Project (SAHRIS case ID 21383) and the BPM Expansion Project (SAHRIS case ID 21384, this case) in Fetakgomo Tubatse Local Municipality of the Limpopo Province. The expansion project is located on the following farms: Diamand 422 KS, Zeekoegat 421 KS, Middelpunt 420KS, Umkoanesstad 419 KS, Wintersveld 417 KS, Brakfontein 464 KS, Moeijelyk 412KS, Klipfontein 465 KS, and Zwartkoppies 413 KS. It will include the following activities: Open pit areas: UG2 (four pits) and Merensky (three pits); Additional pollution control dams/settling dams: associated with the open pits, where needed; Waste rock dumps: to be located near the open pit areas; Supporting infrastructure: Contractor's laydown areas, site offices, water management structures, access and haul roads, pipelines and powerlines and associated infrastructure;

A draft Scoping Report has been submitted to SAHRA for commenting in terms of section 38 of the National Heritage Resources Act, no. 25 of 1999 (NHRA). The report mentions that an HIA was commissioned as part of the EIA application process. A number of heritage sites are known within the region, including a Provincial Heritage Site. A total of 27 heritage sites were identified within mine right area.



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The SAHRA issued an Interim Comment dated 06/07/2023 requesting the submission of the HIA report. The report was submitted on 11/07/2023.

*Van Vollenhoven, A. June 2023. A Report on an Archaeological Impact Assessment of Bokoni Permitting Project Limpopo Province.*

The author undertook a field assessment of the proposed mine right area, and identified 27 heritage resources within the proposed Project area – 23 burial grounds and graves, which are of local high significance. 2 sites of low significance will be directly impacted by the proposed mining activities, and 2 archaeological sites of medium significance were identified, as well as the general study area has some background stone aged stone tool occurrences. The author recommends the following:

The identified burial grounds and graves (Site no 3, 4, 5, 16, 25 and 26) have a field rating of Local Grade IIIB are inside of the area of direct impact. Therefore Option 2 is recommended for all of these sites, they must be mitigated and should be included in the heritage register;

Site no 6, 7, 8, 9, 11, 12, 13, 14, 15, 17, 18, 19, 20, 21, 22, 23, and 24 are graves and has a field rating of Local Grade IIIB and must be included in the heritage register and it is recommended that a site preservation management plan is written for the long term conservation of these burial grounds. Access to descendants will not be impacted, as the area falls outside the proposed mine infrastructure area. The current land use will continue concurrent to the underground operations;

Site no 27 and 28 are archaeological sites with a field rating of Local Grade IIIB. The site should be included in the heritage register and may be mitigated (high/medium significance). Mitigation is subject to a permit application lodged with the relevant heritage authority;

Stone tools sites and Iron Age sites have been identified in a previous study within and close to the proposed development, and care should be taken during construction not to disturb these sites;

There are several hills in and around the surveyed area and were traditionally places of residence. They should be avoided during the construction and operation of the mining activities.

The study area has medium and low palaeontological significance as seen on the SAHRIS palaeomap and the palaeomap policy does not require an assessment of impacts, only a Fossil Chance Finds Procedure for low areas and a desktop study for medium area. However, the applicant is exempted from a palaeo study because the medium sensitivity area are small and located on the edge of the proposed development area.

## **Interim Comment**

The Development Applications Unit note the submission of the HIA report however, the case will be processed

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further once the draft EIA report and it's appendices are submitted to the case for commenting.

*It must be noted that the study area is in a region of negligible palaeontological significance according to the SAHRIS palaeomap as such, there is no requirement for an assessment of impacts to palaeontological resources.*

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/617779>