

Our Ref:

Enquiries: Phillip Hine
Tel: 021 462 4502
Email: phine@sahra.org.za
CaseID: 5864

Date: Tuesday August 19, 2014

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Interim Comment

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

Attention: Aquila Steel South Africa (PTY) LTD
Private Bag x75
Bryanston
2021

Meletse Iron Ore Project Section 24G Rectification Application: Ref. 12/1/9-6/Section 24G/15-W1

Miller, S. June 2011, February 2014, May 2014. 1st Phase Cultural Heritage Impact Assessment for The Farms Donkerpoort 448 KQ, Randstephne 455 KQ and Waterval 443 KQ, Thabazimbi, Limpopo Province.

Almond, J. March 2014. Palaeontological Assessment: Combined Desktop & Site Visit Report Proposed Meletse Iron Ore Project on Remaining Extent of the Farms Donkerpoort 448kq and Randstephane 455kq near Thabazimbi, Waterberg District, Limpopo Province

Aquila Steel is applying for a 24G rectification application related to unlawful construction of gravel roads in 2007 related to prospecting activities on the farms Randstephne 455KQ and Donkerpoort 448KQ near Thabizimbi, Limpopo Province. The company is also currently applying for mining rights which is subject to a separate environmental authorisation process.

SAHRA had previously commented on the proposal for the establishment of an open cast mine on the same properties. For this project an Archaeological and Palaeontological Impact Assessment was submitted. These studies were done in 2011. SAHRA was satisfied with the palaeontological assessment which focused on Gatkop Cave. SAHRA had concerns about the archaeological assessment and requested that a new assessment must be done.

The reports that have been submitted as part of this application are updated. The archaeological report has been updated in February and May 2014. The primary focus of the palaeontological report is still Gatkop Cave, however, the palaeontological sensitivity of the entire area was assessed. During SAHRA's assessment of the previous report SAHRA was not satisfied with the level of detail provided in the archaeological assessment. This is because only brief detail has been provided about the sites identified. It was also not clear how any of these sites would be impacted by the mining.

A prominent site that was identified is that of Gatkop Cave. This site holds special significance to communities in and around the area, as well as potential fossil significance due to its possible breccia geology. Due to the complex nature and the sensitivity around its use, the author recommended that an anthropologist should be engaged to undertake a study for decision-making purposes.



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In terms of palaeontological resources the Gatkop Cave was subject to a field assessment, however it is noted that the site will not be impacted by mining. Although the focus of the palaeontological assessment was on Gatkop Cave, the author provided an assessment on the likelihood of significant palaeontological resources on the wider geographic area. According to the specialist the Gatkop Cave is excavated into Precambrian dolomites of the Malmani Subgroup (Chuniespoort Group, Transvaal Supergroup). It is noted that several dolomitic breccias units of various ages, degrees of cementation and sedimentary facies are exposed within Gatkop Cave. According to the specialist, the dolomitic host rocks of the Malmani Subgroup show fine lamination but no well-developed stromatolitic domes or columns, however, the specialist concluded that the palaeontological sensitivity of the Gatkop Cave site is probably of low sensitivity.

In terms of the assessment on the palaeontological sensitivity of the entire area, the palaeontologist indicated that all six layout options for the mine as well as the area for infrastructure are feasible, although Options 4 and 6 are preferable to Options 1 and 3 to higher impact on potentially fossiliferous Malmani dolomites. The author further recommended that where practicable, dolomite rock exposures showing well-developed stromatolites should be safeguarded from damage during prospecting and mining activity and related infrastructure development.

In terms of the other heritage resources identified, the report author tabulated the likely impact on heritage resources. According to the information provided in the report the following sites will be impacted:

- Site 4i (a)
- Site 4i (b)
- Site 4i (j)
- Site 5 will possibly be impacted by the upgrading of the road.

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In terms of the heritage resources that are located on the properties that will be mined the Gatkop Cave is considered to be the most significant. The significance of the site lies in its intangible qualities. Due to the sensitivity of the area it was recommended that the significance of Gatkop should be evaluated by an anthropologist. Although the possibility exists that the cave may contain fossil breccia, the palaeontologist considered the likelihood to be low.

Since the landscape holds special significance to surrounding communities SAHRA has received an application to provisionally protect Madimatle Mountain and Gatkop Caves in terms of section 29 (1) (a) of the



The South African Heritage Resources Agency

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* Tel: +27 21 462 4502 * Fax: +27 21 462 4509 * Web: <http://www.sahra.org.za>

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National Heritage Resources Act (Act no 29 of 1999).

Before SAHRA Archaeology, Palaeontology and Metoerites (APM) Unit can issue a Final Comment a detailed Heritage Impact Assessment must be compiled. This will entail not only the evaluation of archaeological and palaeontological resources but also the landscape qualities and intangible heritage of the area. All heritage resources with the exception of the palaeontological significance of Gatkop Cave, should be re-evaluated. The significance of the physical and intangible heritage should be properly described, explained and contextualized. SAHRA will only in a position to make an informed decision on the significance of the heritage resources of the area once this new Heritage Impact Assessment has been compiled and submitted.

Should you have any further queries, please contact the designated official using the case number quoted above in the case header.

Yours faithfully

Phillip Hine
Heritage Officer

Colette Scheermeyer
SAHRA Head Archaeologist
South African Heritage Resources Agency

ADMIN:

Direct URL to case: <http://www.sahra.org.za/node/166907>



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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.



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