



an agency of the
Department of Arts and Culture

T: +27 21 462 4502 | F: +27 21 462 4509 | E: info@sahra.org.za
South African Heritage Resources Agency | 111 Harrington Street | Cape Town
P.O. Box 4637 | Cape Town | 8001
www.sahra.org.za

Enquiries: Natasha Higgitt

Date: Thursday April 07, 2016

Email: nhiggitt@sahra.org.za

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CaseID: 8779

Final Comment

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

Attention: Pioneer Minerals PTY LTD
PO Box 723
PAROW
7499

THE REMHOOGTE MINE ON THE REMAINDER AND PORTION 1 OF THE FARM REMHOOGTE AS WELL AS THE REMAINDER OF PORTION 3 OF THE FARM HOLSOOT 47 NEAR PRIESKA IN THE NORTHERN CAPE PROVINCE.

EKO Environmental was appointed by Pioneer Minerals (Pty) Ltd to undertake an Environmental Impact Assessment (EIA) process for the proposed Remhoogte Mine. The proposed project is located on the Remainder of the farm Remhoogte 152 and Portion 3 of Holsloot 47, in the Siyathemba Local Municipality, Northern Cape Province. Activities associated with the proposed project include the construction of a 4.37 km pipeline, diesel storage, development and expansion of roads, clearing of more than 20 hectares, and processing of diamond mineral resources. The mining operation will be conducted by opencast mining methods using earthmoving machinery and occasional blasting, after which the ore will be treated and processed on site.

The first Heritage Impact Assessment (HIA) was conducted in 2011 by J van Schalkwyk for the Remainder and Portion 1 of the farm Remhoogte 152. The second HIA and the Palaeontological Impact Assessment (PIA) was conducted in 2016 by L Rossouw for the farm Holsloot 47.

Van Schalkwyk, 2011. Heritage Impact Assessment for the Proposed Diamond Mining Development on the farm Remhoogte 152, Prieska Magisterial District, Northern Cape Province.

Three areas of heritage significance were recorded within remainder and portion 1 of the farm Remhoogte 152. These include areas with Middle Stone Age (MSA) occurrences and red sand dunes that may contain Later Stone Age (LSA) material. Historical mining operations with an associated structures and a burial ground containing more than 50 graves were located within the footprint of the mining operation. The impact to the MSA material would be low, the impact to possible LSA material located within the red dunes would be high and the historical diamond mining operations would definitely be impacted by the proposed mining activities.

Recommendations provided in the report are as follows:



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- Systematic collections of the MSA material located within the proposed mining right area should be conducted;
- If a major feature such as a burial or cache of ostrich eggshell flasks is uncovered during mining operation within the red dunes area, work should be halted and an archaeologist called to site to evaluate the finds; and
- A Phase 2 study is to be completed on the historic mining complex prior to further mining activities taking place. This would include documentation, mapping and photographing of all mining related features on site, systematic excavations and surface collections. The associated burial ground must be avoided, however, should this not be possible, they should be relocated after the proper procedures as prescribed by the NHRA and SAHRA are followed.

Rossouw, 2016. Phase 1 Archaeological Impact Assessment of a section of the farm Holsloot 47 near Prieska, NC Province.

The report divided up the section of the farm Holsloot 47 into three sections for reporting purposes i.e. Area 1, Area 2 and Area 3. Area 1 had already been extensively disturbed by mining activities and has a low potential for *in-situ* heritage resources. Area 2 contained individual stone tool artefact surface scatters and is capped by well developed Aeolian sandy deposits that do not appear to contain heritage resources. Area 3 is covered by a substantial sandy overburden and it is unclear whether heritage resources are buried below the surface.

Recommendations provided in the report are as follows:

- No further mitigation measures are recommended for Area 1;
- A 10 m buffer must be established along the eastern boundary of the study area i.e. Area 2, in order to maintain a representative sample of the archaeological landscape;
- A representative sample of surface occurrences in Area 2 that lie outside the proposed buffer zone must be mapped, recorded and photographed and added to the buffer zone keeping; and
- Future mining into Area 3 must be accompanied by archaeological monitoring on a regular basis through spot check of freshly dug test pits.

Rossouw, 2016. Phase 1 Palaeontological Impact Assessment of a section of the farm Holsloot 47 near Prieska, NC Province.

The study area is underlain by Tertiary gravel deposits with a high potential for vertebrate fossils, though given their nature, it is difficult to predict the buried fossil content. The affected area is rated as Generally Protected A. Recommendations provided in the report include the need for palaeontological monitoring on a regular



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basis on excavations into calcrete deposits and underlying palaeo-gravels.

The draft EIA states that mining operations are currently occurring and have excluded all sensitive heritage areas as identified in the 2011 HIA. If the mining operation is approved, heritage resources will be protected through the demarcation of no-go zones and fencing off of graves.

Final Comment

Regarding archaeological and palaeontological heritage resources, the SAHRA Archaeology, Palaeontology and Meteorites Unit accepts the submitted HIAs and PIA, promotes the recommendations contained within the reports. The following additional conditions must be adhered to and must form part of the final Environmental Management Programme (EMPr) should Environmental Authorisation be granted for the project:

- A buffer of 30 m must be maintained around all identified heritage resources including the burial ground;
- Should the buffer not be feasible, systematic collection of the MSA material must be conducted subject to the approval of a permit application in terms of section 35 of the National Heritage Resources Act, 1999 (NHRA);
- Should the buffer not be feasible, a Phase 2 study (subject to the approval of a permit application) must be conducted on the historical mining complex which must include detailed recording, mapping, photographs and excavations of deposit that will be impacted by the mining activities. The results of this study must be collated into a report that must be submitted to SAHRA upon completion, after which SAHRA will provide comments and the way forward;
- Should it not be possible to conserve the burial ground in-situ, a consultation process in terms of section 36(5) of the NHRA and Chapter X of the NHRA Regulations must be conducted, thereafter a permit in terms of section 36(3) of the NHRA and Chapter IX of the NHRA Regulation may be applied for;
- An archaeologist must be contracted to monitor on a regular basis to examine new ground clearance and test pits in Area 3 as indicated by the 2016 HIA. A Monitoring Report must be submitted to SAHRA upon completion;
- A palaeontologist must be contracted to monitor on a regular basis, freshly excavated areas within calcrete deposits and underlying palaeo-gravels throughout the proposed project area. A Monitoring Report must be submitted to SAHRA upon completion;
- A Conservation Management Plan must be developed to ensure the on-going conservation of identified heritage resources (historical ruins, burial grounds and graves) during the life of the development should the *in-situ* conservation be deemed feasible. This report must be submitted to SAHRA once the EA has been approved and must form part of the EMPr.

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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 APM Unit (Natasha Higgitt/Phillip Hine 021 462 5402) must be alerted. If unmarked human burials are uncovered, the SAHRA Burial Grounds and Graves (BGG) Unit (Itumeleng Masiteng/Mimi Seetelo 012 320 8490), must be alerted immediately. A professional archaeologist or palaeontologist, depending on the nature of the finds, must be contracted as soon as possible to inspect the findings. If the newly discovered heritage resources prove to be of archaeological or palaeontological significance, a Phase 2 rescue operation may be required.

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

Yours faithfully

Natasha Higgitt
Heritage Officer
South African Heritage Resources Agency

Phillip Hine
SAHRA Head Archaeologist (Acting)
South African Heritage Resources Agency

ADMIN:

Direct URL to case: <http://www.sahra.org.za/node/344910>
(DENC, Ref: 01/02/2015(L1.3.8) & 2/03/2015)

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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.