

Our Ref:



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: Nokukhanya Khumalo

Tel: 021 462 4502

Email: nkhumalo@sahra.org.za

CaseID: 14428

Date: Friday November 22, 2019

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Interim Comment

In terms of Section 38(3), 38(8) of the National Heritage Resources Act (Act 25 of 1999)

Attention: Mrs Franciska Lake

SRK Consulting (Pty) Ltd - Johannesburg

265 Oxford Road, Illovo 2196, South Africa

The integrated environmental authorisation process for the amendment of the Environmental Management Programmes to include components of the proposed expansion project at Mogalakwena Mine, Limpopo Province, South Africa.

SRK Consulting (Pty) Ltd has been appointed by Mogalakwena Mine (Pty) Ltd to make undertake the Integrated Environmental Authorisation (EA) application for the amendment of the Environmental Management Programmes and existing EAs of the Mogalakwena Mine to add additional infrastructure. The mine is situated approximately 30 km north-west of the town of Mokopane within the Mogalakwena Local Municipality, Waterberg District Municipality, Limpopo Province.

The Draft Environmental Impact Assessment/Environmental Management Programme report was submitted in terms of the National Environmental Management Act, act 107 of 1998 and the National Environmental Management Waste Act of 2008 in respect of listed activities that have been triggered by applications in terms of the Mineral And Petroleum Resources Development Act of 2002 (MPRDA) (as amended).

The proposed expansion will be constrained to the location of the existing infrastructure within Mogalakwena Mine's mining right and surface lease areas on remaining extent of portions 0 of the farm Blinkwater 820 LR and Portions 0 of the farms Overysel 815 LR, Zwartfontein 818 LR, Vaalkop 819 LR and Sandsloot 236 KR.

A Heritage specialist report was undertaken by PGS Heritage which identified a total of 71 archaeological and heritage sites within the development footprint. The report is not submitted to the case on SAHRIS.

The heritage sites include, graves and burial grounds, homesteads where the potential risk for the presence of unmarked stillborn graves exist, farmstead site with a historic farmstead and a confirmed burial ground, Stone Age sites, a possible rain-making site, Late Iron Age stonewalled site, lower grinding stone and rubbing post along with a sacred tree and sacred water site located near Sekuruwe .

The development poses high impact on a number identified burial grounds and these sites will have to be



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relocated to a suitable area. Prior to the commencement of the preconstruction phase, a qualified archaeologist shall accompany the construction team and indicate where sensitive cultural heritage and archaeological sites are located. Consultation (detailed social consultation process of at least 60 days in length) regarding Interpretation of sites and identified graves that will be impacted should be conducted with members of Sekuruwe before construction. This report must also provide recommendations as to whether any additional mitigation would be required for the site to be destroyed as part of the development. Permits will be obtained from all the relevant authorities. Disturbance of graves where not possible to undertake relocating of graves according to legal requirements must be avoided and to determine mitigation in consultation with local communities.

The remaining sites which will have to be mitigated must be assessed in the field by a suitably qualified Stone Age specialist prior to site clearance Any recommendations made by the Stone Age specialist must be adhered to Such recommendations may include the archaeological recording of a surface layout plan, surface collection of lithics.

An attempt must be made to identify any archaeological middens associated with this site. Should such middens be identified, archaeological test excavations would be required. A permit application to SAHRA for archaeological test excavations to take place. Once the permit is received, limited archaeological test excavations may also be required, should a deposit be identified. An archaeological mitigation report must be compiled. A destruction permit application must be lodged with (SAHRA) to allow for the destruction of some sites of not very high significance after recording.

A palaeontology desktop assessment was undertaken as part of the proposed Expansion Project.

The Expansion area is located partially on the Chuniespoort Group which is considered to be of high palaeontological significance. There is a high likelihood that stromatolitic fossil assemblages may be present.

Excavations more than 1 meter deep into the Malmani Subgroup bedrock needs to be monitored by a professional palaeontologist as part of a Phase 1 assessment in case of chance exposure of stromatolite fossil remains, while such excavations are still open.

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The SAHRA APM unit notes the Heritage Impact Assessment and recommendation included in the draft EIA and that the Heritage specialist studies have been undertaken.

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Please submit the Heritage Impact Assessment and the Palaeontological Impact Assessment before an informed comment can be given.

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

Yours faithfully

Nokukhanya Khumalo
Heritage Officer
South African Heritage Resources Agency

Phillip Hine
Manager: Archaeology, Palaeontology and Meteorites Unit
South African Heritage Resources Agency

ADMIN:

Direct URL to case: <http://www.sahra.org.za/node/529882>
(, Ref: LP30/5/1/2/2/50 MR)

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.

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3. SAHRA reserves the right to request additional information as required.