Our Ref:

**Enquiries: Phillip Hine** Tel: 021 462 4502 Email: phine@sahra.org.za CaseID: 1825

Date: Thursday November 07, 2013





an agency of the Department of Arts and Culture

# Interim Comment

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

Attention: Ms Chantal Smith AGES Environmental Unit Postnet Suite 74 Private Bag X07 Arcadia 0007

Proposed construction and operation of Lesego Platinum Mine and associated infrastructure located on the farms Koppieskraal 475 KS, Spelonk 478 KS, Dal Josaphat 461 KS, Olifantspoort 479 KS, Eerste Regt 502 KS, Government Ground 503 KS, Zaaikloof 480 KS and Stofpoort 481 KS, Limpopo Province

Lesego Platinum Mining (Pty) Ltd. proposes the establishment of a platinum mine on the farms farms Koppieskraal 475 KS, Spelonk 478 KS, Dal Josaphat 461 KS, Olifantspoort 479 KS, Eerste Regt 502 KS, Government Ground 503 KS, Zaaikloof 480 KS and Stofpoort 481 KS, Limpopo Province. A heritage assessment was undertaken for this project, focussed archaeological, built environment and graves. No palaeontological assessment was undertaken for this project.

The project area is 3000 hectares. However, the survey undertaken focused on areas earmarked for infrastructure developments and these were marked as Study Area 1 (Tailings Dam Alternative Site), Study Area 2 (Tailings Dam Preferred Site) and Study Area 3 (Mine Production Plant). No palaeontological studies have been undertaken for this project.

### Stone Age

Four Stone Age sites were identified. These were numbered SA01-SA04 and reported to be located along drainage lines. According to the specialist the most significant of the sites identified is SA03 which the author states is an *in situ* Early Stone Age site in calcrete bedrock located along a major drainage line. This site is located in Study Area 3. The author indicated that SA04 is a major MSA scatter that spans the entire north-south drainage line in Study Area 3.

### Iron Age

Five Iron Age sites were identified during the survey. Site IA01 was identified in Study Area 1 and is indicated as part of the series of stone terraces. Four Iron Age sites were identified in Study Area 3. Sites IA03, IA04



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Page No: 2



and IA05 indicates occupation sites according to the report.

### Graves

Four cemeteries were identified during the field assessment. Only BP01 which the author indicated as possible graves identified as elongated stone heaps was located in Study Area 1. Three cemeteries were identified in Study Area 3 (BP02, BP03 and BP04). BP03 is younger than 60 years of age. The ages of the graves at BP02 and BP04 is not given in the report except that the cemeteries appears to be still utilized. According to the Final Scoping Report an aditional follow-up site visit identified a further twenty-graves. These are indicated as Sites BP05, BP06, BP07 and two graves of unknown origin without a site reference.

### Structures

The author identified numerous structures and farmsteads which are indicated to be of recent age. These are scattered all over the area and are considered to be of low significance.

### Decision

- The author recommends that the Stone Age sites identified withing Study Area 3 must be subject to Phase 2 Mitigation Impact Assessments by a qualified Stone Age Archaeologist. In addition, the author recommends that this area should be subject to further by a specialist stone age archaeologist.

- However, according to the Final EIA report only the MSA Site SA01 will be affected by the proposed mining activity. According to the heritage report, the site is of low significance and not *in situ*. Considering that the site of low significance SAHRA recommends no further actions with regard to Site SA01. Please note that the EIA report states that none of the other stone age site will be affected by mining . To ensure that this is the case, a Conservation Management Plan must be developed for the future protection and conservation, in particular of the ESA site SA03.

- Since none of the Iron Age Sites will be affected by the proposed mining, SAHRA requires no further action, apart from the fact that the conservation of the sites is the responsibility of the developer. All contractors and staff should be made aware of their importance and that they may not be disturbed or damaged without a permit from SAHRA.

- It is recommended that cemeteries be retained in situ, fenced with access gates installed to allow visits from relatives and friends. No development is allowed within 15-20m from the perimeter of the fence. If this is not



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Page No: 3



feasible, relocation will only be supported if consent is provided by identified relatives and a permit in terms of sections 36 will be required for any graves 60 years or older.

- Decisions regarding the historical structures older than 60 years must be referred to the Limpopo Heritage Resources Authority (Mr. Donald Lithole, <u>Litjolek@sac.limpopo.gov.za</u>). They may not be demolished without a permit from the relevant heritage authority.

- The recommendation that a Palaeontological Assessment must be undertaken is supported. This must be submitted to SAHRA prior to any mining activities taking place.

- If archaeological or any other heritage resources are found during mining activities, SAHRA (Mr Phillip Hine/Mrs Colette Scheermeyer, tel. 021 462 4502) and an archaeologist/palaeontologist must be alerted immediately depending on the find. If the newly discovered resource turns out to be significant than a rescue excavation 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

June

Phillip Hine Heritage Officer

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Colette Scheermeyer SAHRA Head Archaeologist South African Heritage Resources Agency

ADMIN: Direct URL to case: http://www.sahra.org.za/node/114903



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Page No: 4



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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.



The South African Heritage Resources Agency

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