

Final Comment

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

Attention: Platreef Resources (Pty) Ltd

The proposed Platreef Platinum Project on the farms Bultongfontein 866 LR, Turfspruit 241 KR, Macalacaskop 243 KR and Rietfontein 2 KS in Mokopane, Limpopo Province

Higgitt, N., Karodia, S., du Piesanie, J., & Nel, J. Pilansberg Platinum proposes the development of an underground platinum mine and associated infrastructure on the farms Bultongfontein 866 LR, Turfspruit 241 KR, Macalacaskop 243 KR and Rietfontein 2 KS in Mokopane, Limpopo Province. The associated infrastructure includes, haul roads, tailing storage facilities and workshop and processing plant.

A Heritage Statement has been previously submitted to which SAHRA provided comment on the 21 August 2013, requesting the following:

- *A heritage impact assessment must be compiled and included in the environmental impact assessment report.*
- *The heritage impact assessment must include archaeology, palaeontology, intangible heritage and an assessment of burial grounds and graves (s. 36 of the NHRA).*
- *Given the proximity (20km) of the mine to the National and World Heritage Site of Makapan, SAHRA recommends that the possible impact of the mine on this site be assessed. This assessment must also consider the likely visual impact.*
- *The palaeontological impact assessment, conducted by a palaeontologist, must take into consideration the entire mining area. SAHRA leaves it to the discretion of the specialist to decide which sections of the project area should be subjected to a field survey.*

The Heritage Impact Assessment has since been submitted to SAHRA for review. The submitted report identified three archaeological sites, fifty-five burial grounds and a historical werf. In addition, a number of Iron Age and Stone Age occurrences have been identified throughout the area to be developed. These are considered to be of low significance by the specialist and no further action has been recommended for these occurrences. The report also considered the visual impact of the proposed mine on the Makapan World Heritage Site which is situated approximately 20km from it.

According to the HIA report no heritage sites were identified in the area for the preferred Tailings Storage facility (TSF Option1) and the five landfill sites. In terms of heritage resources identified, the report notes 25 isolated surface occurrences, three archaeological sites, fifty-five burial grounds and graves and a Historical

Werf. The following sites were identified in the areas earmarked for developments:

TSF Option 2

In this area eleven isolated surface occurrences and one stone walled site was identified. Of the eleven isolated occurrences, three are stone age and eight Iron Age occurrences. According to the report, S.35-001, S.35-005, S.35-007 to S.35-13 were assigned a low significance field rating and the authors recommended no further action for these occurrences.

S.35-006 is an Iron Age smelting site with terraced walling and located in two sections. A portion of the site falls within the area earmarked for Tailing Storage Facility. The other section is located 800 meters outside of the TSF. According to the report the site will be destroyed by the TSF and requires mitigation.

TSF Option 2 Pipeline:

This area contained and isolated occurrence of a collapse stone walling, S.35-077, and five burial grounds. It was recommended that the burial grounds be avoided and if this is not possible relocation will have to occur. The collapse stone walling is considered to be of low significance and no further action was recommended.

TSF Option 3

This area contains ten isolated surface occurrences and one burial ground. Of the ten isolated occurrences, three were stone age scatters, and eight were Iron Age scatters. The archaeological scatters are considered to be of low significance and the author recommended no further action.

The single S.36-023 is being cared and maintained for and may be associated with the local community. The authors recommended relocation if the grave cannot be incorporated within the development.

TSF Option 3 Pipeline

In this area one surface and one historical werf was identified. The authors recommended that the Site 34.083 (Historical Werf) should be avoided and if this is not possible recorded fully by a Built Environment specialist. Site 36-085 is a formal cemetery. The authors requested that the cemetery should be avoided.

Operational Area

Two isolated surface occurrences in the form of 1 Middle Stone Age Artefact and 1 potshard was identified. In addition, forty-two burial grounds identified all of which may be impacted by the proposed development. An Iron Age/Historical Site (S.35-027) was also identified. The site is dominated by circular and rectangular stone foundations and remnants of walls. According to the the report five burials are within the site, although these are not actually related to the site.

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It is indicated in the report that all sites will be impacted by the proposed development. The report recommended that if the burials cannot be incorporated into the development they will have to be relocated.

According to the information received the Operational Area cannot be relocated because it will surround the production shafts that was dictated by access to underlying ore bodies. "*The operational area was therefore situated as close to the Production shaft as possible to minimise additional footprint areas that may have been required otherwise. A Formal site selection was done as part of the EIA investigations, but the other viable options were fatally flawed due to potential resource sterilization and proximity to flood plain.*"

Alternative Plant Area

An archaeological site, five burials grounds and a single grave was identified in the area. The archaeological site S.35-071 is situated over 90 percent of the Plant area. It will not be able to incorporate the site and it will have to be mitigated. The authors recommended relocation of the graves if it is not possible to incorporate them within the Alternative Plant Area.

Palaeontological Resources

According to the heritage report no surface fossils were identified during the field assessment, especially in areas overlying the rocks of the Duitschland Formation and the Malmani Supergroup of the Chuniespoort Group. The Chuniespoort Group has high palaeontological significance due to the likelihood of impact to cave breccia resources such as are found in the Makapan WHS. As such, there is a possibility that fossils may be uncovered during excavation and however, this can only be verified through strict palaeontological monitoring.

Final Comment:

Considering the number of heritage resources identified, SAHRA makes the following recommendations:

1. Since no archaeological or any other heritage resources were identified in the area proposed for the Tailings Storage Facility Option 1 and its proposed pipeline, SAHRA prefers this option considering that the TSF2 and TSF3 and its related pipelines will likely result in negative impact on heritage resources. If either TSF Option 2 or 3 and their associated pipeline are selected for development, SAHRA must be informed in writing as to the motivation for this selection and further mitigatory studies may be required.
2. No further action is required for the isolated surface occurrences in the Operational Area.
3. Should it not be possible to retain the Iron Age Sites, S.35-027 and S.35-071 *in situ* by incorporating them into the design of the proposed mine, these sites will have to be fully mitigated. The responsible archaeologist will require a Phase 2 permit in terms of section 35 of the NHRA will have to be obtained from SAHRA before work can commence. The sites will have to be fully documented, with detailed site photographs, scaled



drawings and excavated representative samples where required.

4. The SAHRA Burial Grounds and Graves Unit will only support relocation of burials in the Operational Area and the Alternative Plant Area if it is not feasible or practical to retain the identified graves. The developer will have to provide proper motivation for relocation. Please note that a permit in terms of section 36 of the NHRA will have to be obtained from SAHRA and a 60 day public consultation process followed.

5. The recommendation for monitoring for palaeontological resources is supported. A strict monitoring and reporting protocol must be included in the EMP which must be approved by SAHRA.

6. All other heritage resources identified in the HIA including those impacted by TSF2, TSF3 and its proposed pipelines will have to be retained *in situ* and a Conservation Management Plan development for their continued protection. Grave sites 60 years or older in these areas will have to be cleaned, fenced and access gates installed to allow visits from relatives and family friends.

6. If any archaeological/palaeontological or any other heritage resource is uncovered during the course of construction activities SAHRA APM Unit (Mrs Colette Scheermeyer/Mr Phillip Hine, tel. 021 462 4502) or an archaeologist/palaeontologist must be alerted immediately to inspect the findings. If the newly discovered heritage resource is considered to be significant a rescue excavation may be required at the cost of the developer.

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/66901>

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.