

Our Ref:

Enquiries: Phillip Hine
Tel: 021 462 4502
Email: phine@sahra.org.za
CaseID: 7825

Date: Wednesday July 15, 2015

Page No: 1

Letter

In terms of Section 38(4) of the National Heritage Resources Act (Act 25 of 1999)

Attention: Kumba Iron Ore
PO Box 9679
Centurion
0046

Heritage Impact Assessment for the Proposed Dingleton Grazing Project on a Portion of the Farm Marsh 467, Dingleton, Gamagara Local Municipality, Northern Cape Province.

Dear Mr Birkholtz,

Thank you for your email inquiry regarding the above matter. Please see SAHRA's response below:

1. The SAHRA comment is based on the Impact Assessment Report that was submitted. The report indicated that the footprint was surveyed with the aid of a vehicle. SAHRA took this to mean that the footprint was not subject to a pedestrian survey;
2. SAHRA notes that the survey was limited to the fence, the dams and the short pipeline, i.e. areas that will be subject to infrastructure development. SAHRA holds the opinion that the entire project area should have been surveyed. Because this was not done we do not have a complete picture of all potential heritage resources that may be present on the property. It is further noted that that the short pipeline north east of the R380 of the study area is not included in any of the maps provided as described in the following section **"The proposed Dingleton Grazing land, with the associated infrastructure, is situated on a portion of the Farm Marsh 467 to the north-west of the town of Kathu in the Gamagara Local Municipality, Northern Cape Province. Except for a short pipeline section, the study area is situated west of the R380 provincial tar road between Kathu and Dibeng. The Sishen Airport is located directly opposite from the proposed development area. The tar road runs between these two localities" (page 6)**
4. The report mentioned that the Stone Age specialist undertook a site visit but that the survey was done by Mr Marko Hutten and his assistant. It is SAHRA's understanding that Mr Marko Hutten and his assistant are not experienced Stone Age specialists, in particular as it relates to the Early Stone Age. Please also note that in terms of section 38 (2) (a) SAHRA may request that the impact assessment be done by "person or person's approved by the responsible heritage resources authority with relevant qualifications and experience and professional standing in heritage resources management".
5. The surface geology of the site is only briefly described in the report with several photographs attached. Assessments elsewhere in the Kathu area noted intra-site variability in surface geology. At the minimum the site photographs should have been explained in more detail.
6. Due to the incomplete nature of the field survey SAHRA requests that a more comprehensive field survey must be undertaken for the entire project area. SAHRA notes that the terms of reference for the assessment provided to the study team may only have been to investigate the areas along the infrastructure footprint.

Proposed Dingleton Grazing Project

Our Ref:

Enquiries: Phillip Hine
Tel: 021 462 4502
Email: phine@sahra.org.za
CaseID: 7825

Date: Wednesday July 15, 2015

Page No: 2



an agency of the
Department of Arts and Culture

7. SAHRA has no objection to the proposed activity and the development should be monitored by an appropriately qualified archaeologist, however, this does not negate the fact that a survey must be done for the entire study area. Once this survey report and the monitoring report is submitted, SAHRA will be able to issue final comments.

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
South African Heritage Resources Agency

Colette Scheermeyer
SAHRA Head Archaeologist
South African Heritage Resources Agency

ADMIN:

Direct URL to case: <http://www.sahra.org.za/node/273603>

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

Street Address: 111 Harrington Street, Cape Town 8000 * Postal Address: PO Box 4637, Cape Town 8000
* Tel: +27 21 462 4502 * Fax: +27 21 462 4509 * Web: <http://www.sahra.org.za>