

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: Elijah Dumisani Katsetse

Tel: 0214624502

Email: ekatsetse@sahra.org.za

CaseID: 16786

Date: Tuesday November 30, 2021

Page No: 1

Final Comment

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

Attention: Turnover Trading (Pty) Ltd

The proposed Mining Right Application for Turnover Trading (Pty) Ltd - Sterkfontein 155, Putfontein 62, Omega 478, Holgat 63, Wildfontein 201, Leeuwfontein 64 & Farm 533

Milnex CC (Pty) has been appointed by Turnover 251 (Pty) Ltd to conduct an Environmental Authorisation for Mining Rights application for the mining of Diamond General (D) on remaining of Portion 6, 7, a0, and Portions 8, 17, 19 of the Farm Sterkfontein 155, Portion 29, 30, 31, 32, 33, 34, 45, 46, 47, 48, 49, 50, 51, 52, 53, 54, 55, 56, 57, 58, 59, 60, 61, 63, 64, 65, 68, 69, 70, 66, and a certain Portion of Portion 62, the remainder of Portion 1 & 7, of the Farm Putfontein 62. Portions 1 & 2 of the remainder of the Farm Omega 478. Portion 3 and the remainder of the Farm Holgat 63. Portion 4, 5 & the remainder of Portion 2 of the Farm Wildfontein 201. The remainder of Portion 5 & 31 of the Farm Leeuwfontein 64. A certain Portion of the remainder of Farm 533; Registration Division: IP, North West Province.

A draft Scoping Report (DSR) has been submitted in terms of the National Environmental Management Act, 1998 (NEMA) and the 2014 EIA Regulations for activities that trigger the Mineral and Petroleum Resources Development Act, 2002 (MPRDA)(As amended). The proposed mining right application entails Diamond (general) mining, associated infrastructure, structure and earthworks.

In an Interim Comment issued on 10/08/2021 (<https://sahris.sahra.org.za/node/579760>), the SAHRA APM Unit acknowledged receipt of the DSR report and requested that an HIA inclusive of both an archaeological and palaeontological components is undertaken in terms of section 38(3) of the National Heritage Resources Act (25 of 1999) as part of the EA application process. Since the issuing of the Interim Comment:

Banzai Environmental (Pty) Ltd and van Schalwyk, J.A. were appointed to provide heritage specialist input as part of the EA process as required by section 24(4)b(iii) of NEMA and section 38(8) of the National Heritage Resources Act, Act 25 of 1999 (NHRA).

van Schalkwyk, J.A. October 2021. Phase 1 Cultural Heritage Impact Assessment: The Proposed Mining Right Application for Mining of Diamond General (D) on Various Portions of the Farms Sterfontein 155, Putfontein 62, Omega 478, Holgat 63, Wildfontein 201, Leeuwfontein 64 and Farm 533, Registration Division: IP,



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

Ditsobotla Local Municipality, North West Province.

The specialist undertook a field assessment of the development area and identified several sites, features, and/or objects of cultural and heritage significance:

- Two sites (7.1.1-7.1.2) dating to the Late Stone Age were identified. The one is classified as a factor site where a core, flakes, and tools produced from chert were identified. The second sites contain a number of pecked engravings of humans, animals, and geometric patterns on what is colloquially referred to as the 'rhino rock'. These sites are given a field-rating of grade 3A and it is recommended that the sites are avoided and preserved *in situ*.
- A total of seven (7.3.1.1-7.3.1.7) informal burials sites have been identified. It is taken that some of the graves would date back to the early settlement of the BaTloung in the region, especially in the vicinity of the Mission Station. Unfortunately, most of the graves do not have headstones with dates on them - the earliest identified date was 1924. The burial site is of high local significance and it is recommended that the burial sites are avoided and preserved *in situ*.
- Archaeological Sites: A number (7.3.2.1-7.3.2.2) of homesteads were identified mostly occurring along the Monamaladi River. All of them seem to confirm to the standard pattern: a house (in most cases now demolished); outbuildings consisting of cattle enclosures built with local stones; and an ash midden in close proximity. Apparently, these houses were abandoned when infrastructure services (water and electricity) were installed at the Puttfontein community. The sites are given a field-rating of grade 4A and it is recommended that the sites are avoided with further archaeological investigation of the sites.
- Built Environment: A small hamlet, known as 'Carcal', developed in close proximity of the Bodenstien railway station. It consists of a number of buildings most of which according to their architectural style date to the 1930s and 1940s. The site is given a field-rating of grade 4A and it is recommended that the site is avoided.
-

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: Elijah Dumisani Katsetse

Tel: 0214624502

Email: ekatsetse@sahra.org.za

CaseID: 16786

Date: Tuesday November 30, 2021

Page No: 3

Butler, E. October 2021. Palaeontological Desktop Assessment: Proposed Mining Right Application for Turnover Trading (Pty) Ltd - Sterfontein 155, Putfontein 62, Omega 478, Holgat 63, Wildfontein 201, Leeuwfontein 64 and Farm 533.

The proposed mining footprint is underlain by the following:

- Gravel, Diamondiferous in places,
- Black Reef Formation of the Transvaal Superrroup,
- Oaktree Formation of the Malmani Subgroup, Chuniespoort Group, Transvaal Group, and the
- Allanridge Formation of the Ventersdorp Supergroup.

While the operational area is underlain by the following:

- Gravel, Diamondiferous in places,
- Black Reef Formation of the Transvaal Supergroup, and the
- Allanridge Formation of the Ventersdorp Supergroup.

As the current development (operational area) is underlain by sediments of a moderate palaeontological sensitivity (Quaternary gravel, Black Reef Formation of the Transvaal Supergroup as well as the Allanridge Formation of the Ventersdorp Supergroup) a Low palaeontological sensitivity has been allocated to the development and it is therefore considered that construction of the proposed development is deemed appropriate and feasible and will not lead to detrimental impacts to palaeontological resources of the area. The construction of the development may be authorised and no further palaeontological heritage studies, ground truthing and/or specialist mitigation are required pending the discovery of fossils.

- *However, if construction of any kind would ever expand into the Malmani Subgroup a site visit by a professional palaeontologist will be required. This requirement should be incorporated into the EMPr).*

If any fossil remains are discovered during any phase of construction (for the current application), either on the surface or uncovered by excavations the ECO/site manager in charge of these developments must be notified immediately.

Final Comment

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: Elijah Dumisani Katsetse

Tel: 0214624502

Email: ekatsetse@sahra.org.za

CaseID: 16786

Date: Tuesday November 30, 2021

Page No: 4

The following comments are made as a requirement in terms of section 38(8) of the NHRA in the format provided in section 38(4) of the NHRA and must be included in the Final EIA and EMPr:

- 38(4)a – The SAHRA Archaeology, Palaeontology and Meteorites (APM) Unit has no objections to the proposed development;
- 38(4)b – The recommendations of the specialists are supported and must be adhered to. Further additional specific conditions are provided for the development;
- It is recommended that archaeological sites are preserved in situ. If this is not possible a permit must be obtained from SAHRA for the mitigation of these sites,
- A permit for the mitigation and destruction of section 34 structures must be obtained from the North West Provincial Heritage Resources,
- A minimum buffer of 20m must be established around known burial grounds and graves for the duration of the mining/construction phase,
- In case where blasting takes place during mining activities, the buffer should increase to 200m
- 38(4)c(i) – 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 (Elijah D. Katsetse/Phillip Hine 021 462 5402) must be alerted as per section 35(3) of the NHRA. Non-compliance with section of the NHRA is an offense in terms of section 51(1)e of the NHRA and item 5 of the Schedule;
- 38(4)c(ii) – If unmarked human burials are uncovered, the SAHRA Burial Grounds and Graves (BGG) Unit (Thingahangwi Tshivhase/Mimi Seetelo 012 320 8490), must be alerted immediately as per section 36(6) of the NHRA. Non-compliance with section of the NHRA is an offense in terms of section 51(1)e of the NHRA and item 5 of the Schedule;
- 38(4)d – See section 51(1) of the NHRA regarding offences;
- 38(4)e – The following conditions apply with regards to the appointment of specialists:
 - i) If heritage resources are uncovered during the course of the development, a professional archaeologist or palaeontologist, depending on the nature of the finds, must be contracted as soon as possible to inspect the heritage resource. If the newly discovered heritage resources prove to be of archaeological or palaeontological significance, a Phase 2 rescue operation may be required subject to permits issued by SAHRA;
- The Final EIA and EMPr must be submitted to the SAHRIS application for record purposes;
- The decision regarding the EA application must be submitted to the SAHRIS application for record purposes.

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: Elijah Dumisani Katsetse

Tel: 0214624502

Email: ekatsetse@sahra.org.za

CaseID: 16786

Date: Tuesday November 30, 2021

Page No: 5

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

Yours faithfully

Elijah Dumisani Katsetse
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: <https://sahris.sahra.org.za/node/577659>

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.