



Enquiries: Mariagrazia Galimberti
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CaseID: 216

Date: Friday August 31, 2012

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Final Comment

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

Attention: Mr D Derbyshire
Impuma Quarry (Pty) Ltd
Denron Building
N2
Plettenberg Bay
Western Cape

Van Ryneveld, K., June 2012. Mining Right Application: Farms Klein Rivier (713-32) And Buffelsbosch (742-14), Humansdorp District, Eastern Cape, South Africa

Pether, J., June 2012. Brief Palaeontological Impact Assessment Mining Right Application On Farms Klein Rivier 713 Ptn 32 And Buffelsbosch 742 Ptn 14 District Of Humansdorp, Eastern Cape Province.

SAHRA received an application for mining rights in respect of hard rock drilling and blast surface mining in the Humansdorp district. The application also includes the proposed construction of a processing plant. While the draft EMP was proposing two mining areas, the final EMP, dated August 2012, eliminated Section 1 from the mining operation. Therefore, SAHRA will not comment on Section 1 in terms of the archaeology and palaeontology. Please note that SAHRA agrees with, and supports, the removal of Section 1 from the mining operations and if different plans are made in the future, SAHRA requires that extensive consultation is undertaken with the Heritage Authority. This is necessary because Section 1 is a highly sensitive area and no further development or mining should occur without prior consultation and approval from the heritage authority.

The proposed Section 2 will cover about 14.5ha. The expected mine life is 20 years and the scar on the landscape will be beyond rehabilitation. Please note that the possibility of destroying archaeological artefacts is not unlikely and the process is not insignificant as stated at page 47 of the final EMP. The archaeologist identified one Stone Age site on Portion 32 of Farm Klein Rivier 713. The site dates to the Middle and Later Stone Age and it is mostly of low density, however deflation hollows with a higher concentration of stone artefacts, up to 5-8 per m², have also been identified. The archaeologist did not record any *in situ* material and she explains that this may be related to both processes of erosion and on going landscape formation. Therefore, the possibility of identifying more archaeological artefacts in the area during mining cannot be ruled out, but most likely these will also be *ex situ*.

The archaeologist also undertook extensive consultation with the Gamtkwa community, as requested under section 38(3)(e) of the National Heritage Resources Act. The Gamtkwa community opposed the development



The South African Heritage Resources Agency

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since the material derived from the quarry is to be used for the construction of the proposed nuclear power station at Thyspunt, which the Gamtkwa community opposed. Since Thyspunt and the adjacent areas are considered a sacred place by this community, they do not want any development which impacts on the sense of place of the area to go ahead.

The archaeologist considered the impact that this project will have on the cultural landscape comprising the shifting dunes of Thyspunt. Because the area where Section 2 is proposed is currently occupied by grazing pastures for the dairy farms, and therefore cannot be considered as pristine, it is expected that the impact on the broader landscape will be limited. However it must be considered that the visual experience from the top of the dune system at Thyspunt will be significantly altered by the establishment of the quarry.

The palaeontologist did not undertake a Phase 1 palaeontological impact assessment, but a desktop study based on previous research. The bedrock is composed of sandstone and quartzite of the Table Mountain Group and more specifically of the Peninsula Formation, bordering the more recent Cederberg Formation. Only trace fossils and microfossils of low significance have been identified so far in these formations. The palaeontologist warns about the possibility of uncovering fossils in limited beds of mudrocks/shale between the quartzite units, especially where mudrock is not exposed and therefore not yet weathered.

Decision:

The SAHRA APM Unit recommends that:

- If the establishment of the nuclear power station at Thyspunt, to which SAHRA objected, is not approved, the quarry should not be developed.
- Should the development go ahead, the Stone Age site identified on Section 2 should be inspected prior to development to record the full extent of the exposure and to record typological and technological description. While the site may have no research potential, more detailed description and recording is considered important. A report from this visit should then be submitted to the EC PHRA for further comments.
- After receiving the new report the heritage agency will make further recommendations in terms of the site, specifying whether a destruction permit or further studies will be necessary.
- The ECO should be trained by a palaeontologist in the identification of fossils .
- If any new evidence of archaeological sites or artefacts, palaeontological fossils, graves or other heritage resources are found during mining, the Eastern Cape PHRA (Mr Sello Mokhanya, Tel: 043 642 2811) and a professional archaeologist or palaeontologist depending on the nature of the findings must be alerted immediately.

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



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Yours faithfully

Mariagrazia Galimberti
Heritage Officer: Archaeology
South African Heritage Resources Agency

Colette Scheermeyer
SAHRA Head Archaeologist
South African Heritage Resources Agency

ADMIN:
(DMR, Ref: EC 30/5/1/2/2/10002)

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.



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