



## Final Comment

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

Attention: Exxaro Coal Pty Ltd  
PO Box 9229  
Pretoria 0001  
South Africa

#### Heritage Impact Assessment for the Proposed Thabametsi Project, Lephalale, Limpopo Province

*Digby Wells, October 2012. Heritage Statement For Thabametsi Project, 2327cb, Vaalpensloop 313 Lq, Lephalale, Limpopo Province.*

*Digby Wells, January 2013. Heritage Impact Assessment for the Proposed Thabametsi Project, Lephalale, Limpopo Province.*

An archaeological impact assessment was undertaken in 2010 by Julius Pistorius for the original mining plan for Exxaro Coal (Pty) Ltd. Since then the mine layout plan and the infrastructure developments have been amended and a new property, portion 1 and the Remaining Extent (REM) of the farm Vaalpensloop 313 LQ, was added to the list of farms affected by the mining. Digby Wells was then requested to undertake the environmental studies for the amended project. Both opencast and underground mining activities are proposed for the site.

In October 2012 the heritage section of Digby Wells compiled a heritage statement which took into consideration all information available at the time on the heritage of the farm. The heritage statement was undertaken as a desktop study and concluded that a heritage impact assessment had to be undertaken during the environmental process. The heritage resources identified at the end of the desktop study in the wider Thabametsi Project area were four homesteads, one old reservoir, one Stone Age scatter and four single graves.

The Heritage Impact Assessment included in the Environmental Impact Assessment Report identified a few heritage sites, mostly of low significance. These sites were three Iron Age occurrences, characterised mostly by isolated undiagnostic potsherds, one Stone and Iron Age occurrence and six Stone Age lithic scatters.

The only burial grounds identified contains eleven graves dated between 1959 and 1990. As such, this burial ground is not generally protected under s. 36 of the National Heritage Resources Act, however other legislative requirements apply for graves exhumation.





From a geological perspective, the area is underlain by the Volksrust and Vryheid Formations of the Ecca Group of the Karoo Supergroup, which are known to be fossiliferous. However, during the survey the specialists did not identify any possible outcrops or road cuttings which could allow a specific assessment of the formations in the area.

According to the report all heritage resources identified are located within the opencast mine area and as such they will be affected by the mining activities.

Since all identified archaeological sites are of low significance, no further mitigation is requested. Although site 35.004 has been graded IVb, the likelihood of subsurface deposit is currently minimal. As such, SAHRA recommends that the Chance Find Procedures included in the Environmental Impact Assessment Report be implemented.

There is a high likelihood that fossil material will be identified during mining. As such, it is imperative that if any new evidence of palaeontological fossils are uncovered during mining, SAHRA and a professional palaeontologist must be alerted immediately. It is also recommended that a palaeontologist visits the area at an early stage during the establishment of the opencast mine in order to better assess the palaeontological significance of the area. The Fossil Finds Procedure and Monitoring Protocol included in the Environmental Impact Assessment Report must be adopted.

Since all identified graves are younger than 60 years, s. 36 of the NHRA does not apply.

The Exhumations Ordinance (Ordinance No. 12 of 1980), the Human Tissue Act (Act No. 65 of 1983) and all other relevant legislation will apply.

Decisions on Built Environment (e.g. all structures over 60 years, such as S.34-001) must be made by the Limpopo Provincial Heritage Resources Authority (LIHRA).

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

Yours faithfully

Mariagrazia Galimberti





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Heritage Officer: Archaeology  
South African Heritage Resources Agency

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Colette Scheermeyer  
SAHRA Head Archaeologist  
South African Heritage Resources Agency

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**ADMIN:**

Direct URL to case: <http://www.sahra.org.za/node/67729>  
(DMR, Ref: LP30/5/1/2/2/10013MR)

**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.

