

South African Heritage Resources Agency (SAHRA)
Case ID: 19814 (interim Comment)
Attention: Natasha Higgitt

14 February 2023

The proposed Sishen Expansion Project at SIOM comprises of further pit expansions that include Far south pushback 21 and 19, Lylyveld pit expansion, C&G stockpile at Far south and Lylyveld pit, Moolmans workshop, access road and pollution control dam, proposed Far south Waste Rock Dump, heavy and light vehicle crossing, expansion of the existing tyre storage area, heavy mining equipment park up area, proposed haul roads, and associated mining infrastructure, proposed rerouting of telephone line, powerline and pipelines.

Your interim comment in terms of Section 38(3), 38(8) of the National Heritage Resources Act (Act 25 of 1999) dated 7 November 2022 states that:

The SAHRA Archaeology, Palaeontology and Meteorites (APM) Unit requests that the clarification of the existence of the cemetery be provided as an addendum to the HIA as part of the EIA phase of the application. Should a cemetery be found, an assessment of the impact to the cemetery must be provided, with recommendations for the management of the site.

1. Back ground to the alleged presence of a grave

Prior to conducting the phase 1 HIA the heritage consultants conducted a detailed desktop study and requested the project owner to provide the team with all existing information on the study area. As part of the GIS shapefile supplied to the heritage consultants a grave site/ cemetery was indicated as being present at 27°49'7.58"S, 22°59'22.44"E. The Metadata associated with the point provided no information on the origin or nature of the alleged cemetery or grave, but noted that the data point was created in 1999. The various heritage studies from the South African Heritage Resources Information System (SAHRIS) system, previously conducted on the site were also mute on the presence of the alleged grave/cemetery.

2. Site Assessment

The specific part of the project area was visited and inspected on foot on the 18th of July 2022. The existing so called grave was located with the aid of a Garmin e-Trex 30 and confirmed on the Ipad with the GIS shapefile overlaid on top of a recent aerial photograph. The site consisted of two rocks in an open sandy area with no material or other indication that these can potentially represent a grave site. This was confirmed by spending more than an hour (two archaeologists and the mine representative) in the locality and extensively walking the surrounding context. Several similar occurrence of natural rocks in the sandy area occur over a wide area surrounding the alleged grave site.

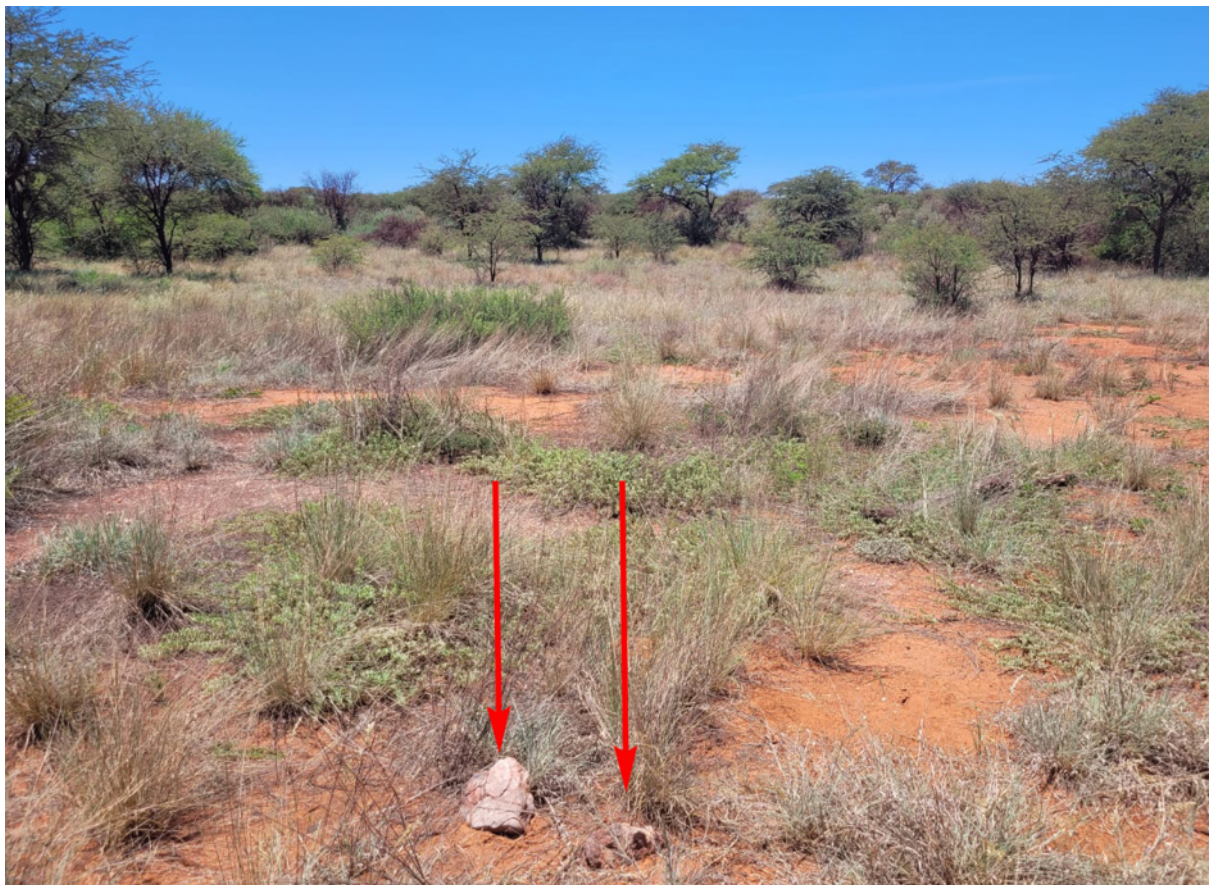


Figure 1. The site of the alleged grave and the presence of the two rocks at the GPS coordinate. There is no evidence to support that is the site of a grave.

During the survey several pieces of rusted metal, glass and a concrete apron associated with prospecting over the last three decades were located in the wider area.



Figure 2. Example of a similar rock occurrence and collapse associated with an animal burrow.



Figure 3. Further example of localised rock and sand associated with animal burrowing activities.

Following the interim comment the site was revisited on 27 November 2022 the outcome being the same as before, it was concluded that no graves or cemeteries are located in the vicinity.



Figure 4. Expanded tracklog around the alleged cemetery/grave site (purple marker)

3. Conclusion / recommendation

It is the professional opinion of the Heritage practitioner that no cemetery or grave/s are present in the locality. This area has been thoroughly surveyed and no features that typify cemeteries or graves could be located during the assessment.

It is not expected that the locality area will yield subsurface heritage or burial sites. However, in the event that construction activities do reveal subsurface sites, the Change Find Procedure (CFP) must be implemented and the heritage authorities informed.

Trust that you find the above in order
Regards

A handwritten signature in black ink, appearing to read 'S. Küsel'.

Siegwalt U Küsel
Prof L Arch (SACLAP) Registration No. 20182
Association of Southern African Professional Archaeologists (ASAPA) Registration No. 367
Principal Landscape Architect & Archaeologist
082 775 4803

Archaeological Chance Finds Procedure (CFP)

There is very low probability of finding/exposing more heritage resources during the construction and operational phases of the proposed development.

- In the event that any sub-surface heritage resources or graves are unearthed all work has to be stopped until an assessment as to the significance of the site (or material) in question has been made by a professional archaeologist. Note that no archaeological material that has been uncovered may be removed.*
- This applies to human remains, formal and informal graves and cemeteries. In the event that any graves or burial places are located during the development, the procedures and requirements pertaining to graves and burials will apply. If human remains are uncovered, or previously unknown graves are discovered, a professional archaeologist needs to be contacted and an evaluation of the finds made.*
- If any archaeological material is uncovered during the course of development, then work in the immediate area should cease. The find will need to be reported to the relevant heritage authority and may require investigation and possibly mitigation by a professional archaeologist.*
- If any area that contains stone artefacts in reasonable numbers (e.g., more than 8-10 within a few square meters) or in high concentrations is noted during the proposed developments this should be inspected by a professional archaeologist prior to any disturbance.*
- If any engraved rocks or rock paintings are noted, the find should be reported.*

All finds or suspected finds must be reported to a professional archaeologist and to the relevant heritage authority